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CATEGORY 1

Effective Date: 2-01-93

Organization: E&WM, Waste Programs

TSCA (TOXIC SUBSTANCES CONTROL ACT) MANAGEMENT PLAN

FEBRUARY 1993



TITLE:
TSCA MANAGEMENT PLAN

Approved By:

T. G. Hedahl

1 28/93

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Associate General Manager,
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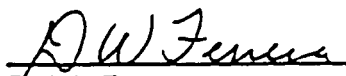
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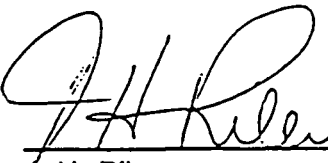
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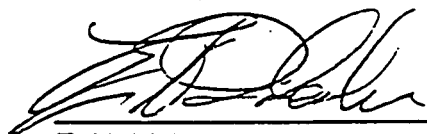
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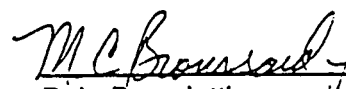
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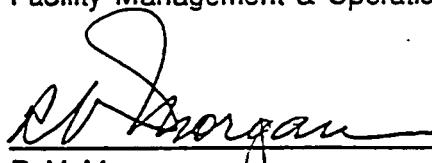
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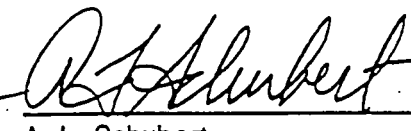
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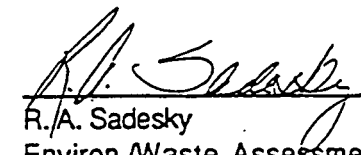
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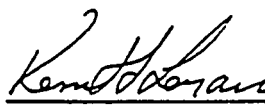
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ROCKY FLATS PLANT
TSCA MANAGEMENT PLAN

1.0 GENERAL

1.1 Purpose

The Rocky Flats Plant (RFP) TSCA Management Plan identifies requirements and responsibilities that shall be met to ensure compliance with all regulatory criteria for the management of areas, facilities, and equipment in which TSCA-regulated substances are present. This includes the identification, labeling, control, waste generation, segregation, characterization, inspection, analysis, testing, handling, packaging, storage, transportation activities, and/or disposal of TSCA regulated waste.

1.2 Scope

The TSCA Management Plan establishes TSCA management program elements and outlines the methods by which RFP shall comply with DOE-RFO, EPA, and CDH requirements. The Plan applies to all personnel in areas and organizations involved in the managing and handling of TSCA-regulated materials and waste. Personnel include all employees of EG&G Rocky Flats, Inc. as well as all contractor personnel who are not directly employed by EG&G Rocky Flats, but are under contract with EG&G Rocky Flats or the Department of Energy Rocky Flats Office.

1.3 Introduction

The TSCA Management Plan provides a comprehensive plan by which TSCA-regulated substances are managed at the Rocky Flats Plant. At the writing of this Plan, the TSCA Requirements Manual is being phased out and replaced by job-specific procedures, which will provide instruction for routine TSCA-related activities (**TASKS 8, 9**). In addition, the TSCA Program Elements and Responsibilities Section (4.0) of this Plan replaces the responsibilities and requirements for TSCA compliance stated in the TSCA Requirements Manual.

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1.4 Terms/Definitions

Small Capacitor

A capacitor which contains less than 3 lbs. of dielectric fluid. The following assumptions may be used if the actual weight of the dielectric fluid is unknown. A capacitor whose total volume is less than 100 cubic inches may be considered to contain less than 3 lbs. of dielectric fluid and a capacitor whose volume is more than 200 cubic inches must be considered to contain more than 3 lbs. of dielectric fluid. A capacitor whose volume 100 and 200 cubic inches may be considered to contain less than 3 lbs. of dielectric fluid if the total weight of the capacitor is less than 9 lbs.

Large high voltage capacitor

A capacitor which contains 3 lbs. or more of dielectric fluid and which operates at 2,000 volts or above.

Large low voltage capacitor

A capacitor which contains 3 lbs. or more of dielectric fluid and which operates below 2,000 volts.

Disposal

To intentionally or accidentally discard, throw away, or otherwise complete or terminate the useful life of PCBs and PCB Items. Disposal includes spills, leaks, and other uncontrolled discharges of PCBs as well as actions related to containing, transporting, destroying, degrading, decontaminating, or confining PCBs and PCB Items.

Excluded PCB products

PCB materials which appear at concentrations less than 50 ppm. The resulting PCB concentration (i.e. below 50 ppm) cannot be a result of dilution, or leaks and spills of PCBs in concentrations over 50 ppm.

Fire-related incident

Any incident involving a PCB Transformer which involves the generation of sufficient heat and/or pressure (by any source) to result in the violent or non-violent rupture of a PCB Transformer and the release of PCBs.

Fluorescent light ballasts

A device that electrically controls fluorescent light fixtures and that includes a capacitor containing 0.1 kg or less of dielectric.

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Generator of PCB waste

Any person whose act or process produces PCBs that are regulated for disposal under subpart D, or whose act first causes PCBs or PCB Items to become subject to the disposal requirements, or who has physical control over the PCBs when a decision is made that the use of the PCBs has been terminated and therefore is subject to the disposal requirements.

Leak

Any instance in which a PCB Article, PCB Container, or PCB Equipment has any PCBs on any portion of its external surface.

Manifest

The shipping document EPA form 8700-22 and any continuation sheet attached to EPA form 8700-22, originated and signed by the generator of PCB waste.

Mark

The descriptive name, instructions, cautions, or other information applied to PCBs and PCB Items, or other objects subject to these regulations.

Marked

The marking of PCB Items and PCB storage areas and transport vehicles by means of applying a legible mark by painting, fixation of an adhesive label, or by any other method that meets the requirements of these regulations.

Owner

For the purposes of this plan, the owner is the person (typically a supervisor) who is responsible for handling, storing and/or using PCBs and/or PCB Items. The owner is usually also responsible for the acquisition and/or disposal of PCBs/PCB Items.

Operator

(1) An individual designated by management to perform operations or conduct activities with radioactive materials at a non-reactor nuclear facility. (2) An individual designated by Rocky Flats' Management to perform operations or conduct activities at the nuclear facility.

Operations Manager

(1) A senior manager designated as having direct responsibility for operation of systems, equipment, or programs in more than one building. (2) The customer of Performance-Based Training and the person who authorizes qualification of employees assigned to their buildings.

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PCB and PCBs
(Polychlorinated Biphenyls)

Any chemical substance that is limited to the biphenyl molecule that has been chlorinated to varying degrees or any combination of substances that contains such substance.

PCB Article

Any manufactured article, other than a PCB Container, that contains PCBs and whose surface(s) has been in direct contact with PCBs.

PCB Article Container

Any package, can, bottle, bag, barrel, drum, tank, or other device used to contains PCB Articles or PCB Equipment, and whose surface(s) has not been in direct contact with PCBs.

PCB Container

Any package, can, bottle, bag, barrel, drum, tank, or other device that contains PCBs or PCB Articles and whose surface(s) has been in direct contact with PCBs.

PCB-Contaminated
Equipment

Any electrical equipment, including but not limited to transformers, capacitors, circuit breakers, recloser, voltage regulators, switches, electromagnets, and cable, that contain 50 ppm or greater PCB, but less than 500 ppm PCB. Oil-filled electrical equipment other than circuit breakers, recloser, and cable whose PCB concentration is unknown must be assumed to be PCB-Contaminated Electrical Equipment.

PCB Equipment

Any manufactured item, other than a PCB container or a PCB Article container, that contains a PCB Article or other PCB Equipment, and includes microwave ovens, electronic equipment, and fluorescent light ballasts and fixtures.

PCB Item

Any PCB Article, PCB Article Container, PCB Container, or PCB Equipment, that deliberately or unintentionally contains or has a part of it any PCB or PCBs.

PCB Transformer

Any transformer that contains \geq 500 ppm PCB.

PCB waste

Those PCBs and PCB Items that are subject to the disposal requirements of Subpart D of 40-CFR-761.

ppm

parts per million

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Retrofill

To remove PCB or PCB-contaminated dielectric fluid and to replace it with either PCB, PCB-contaminated dielectric fluid and to replace it with either PCB, PCB-contaminated, or non-PCB dielectric fluid.

RMMA

Radioactive Material Management Area (RMMA). An RMMA is an area in which the potential exists for contamination due to the presence of unencapsulated or unconfined radioactive material, or beams of radiation that could cause activation of property. RMMAs are areas where waste and property are controlled as radioactive until proven otherwise. RMMA is a term created by DOE Headquarters to designate which areas are considered to have the potential to generate radioactive waste. RMMAs will be classified by Radiological Engineering in accordance with RE 1108, Radiological Evaluation of Areas, Rooms, and Buildings.

Small quantities for research
and development

Any quantity of PCBs (1) that is originally packaged in one or more hermetically sealed containers of a volume of no more than five milliliters, and (2) that is used only for purposes of scientific experimentation or analysis, or chemical research on, or analysis of, PCBs, but not for research or analysis for the development of a PCB product.

Totally enclosed manner

Any manner that will ensure no exposure of human beings or the environment to any concentration of PCBs.

TSCA

Toxic Substance Control Act

WEMS

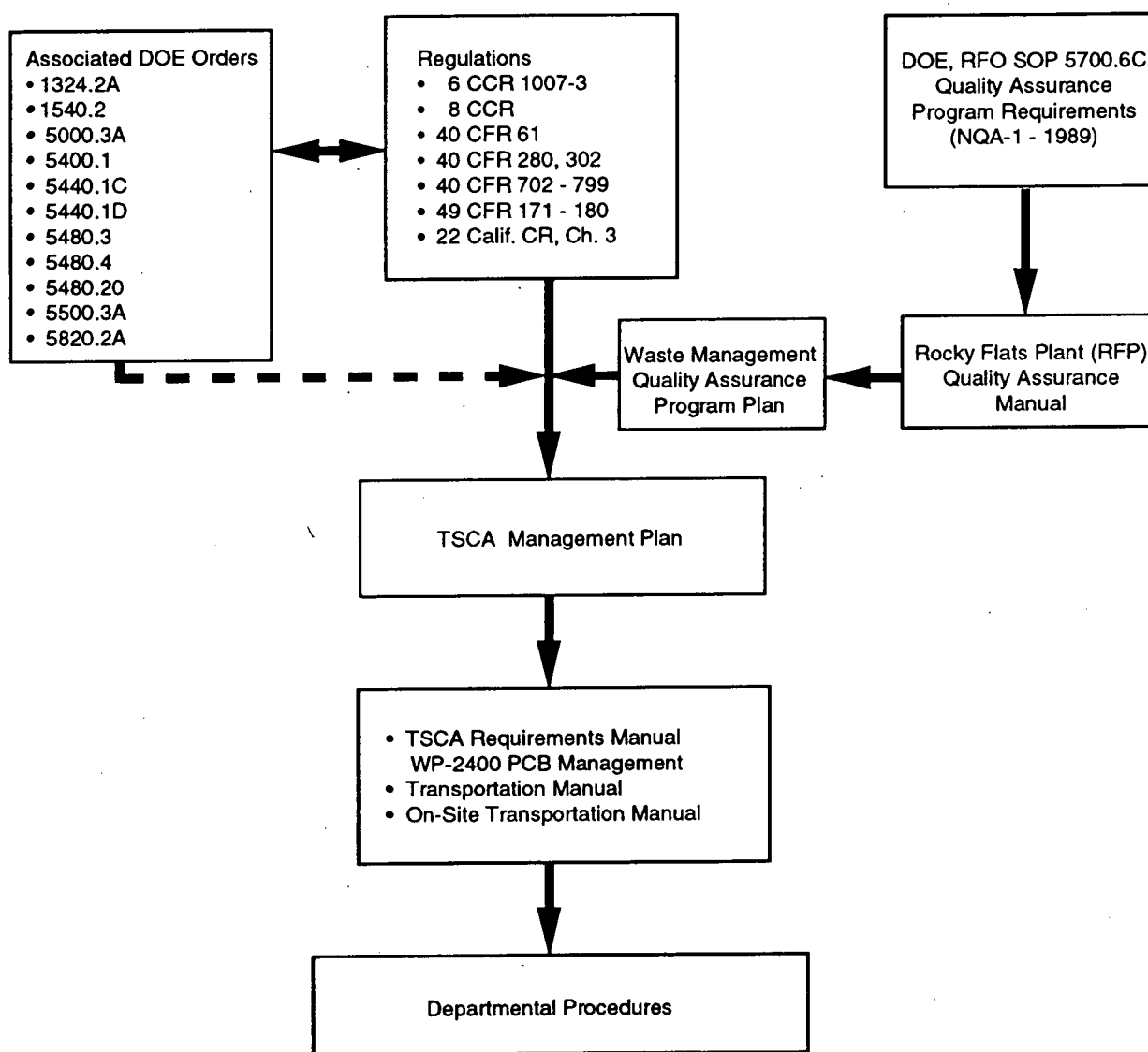
Waste and Environmental Management System - a computer database within the Waste Programs department that tracks waste packages from the point of generation until shipped off-site.

WFC

Waste Form Code.

2.0 REQUIREMENTS HIERARCHY

Figure 2.1



NOTE: A solid line indicates a direct requirements flowdown through the TSCA management program. A dashed line indicates an indirect flowdown; the direct flowdown hierarchy for these requirements is not shown.

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3.0 TSCA PROGRAM MANAGEMENT

The TSCA Program Administrator, within the Waste Regulatory Programs organization, is responsible for the development, management, and overall administration of the TSCA program to ensure compliance at the Rocky Flats Plant. The responsibilities of the TSCA Program Administrator are as follows:

- Provide, within this document, the elements of the TSCA regulations applicable to RFP. The methods used to understand and apply the elements of the TSCA regulations are presented here to achieve and maintain fundamental compliance to regulations.
- Provide technical guidance and direction as subject matter experts, on all aspects of the TSCA regulations as they relate to RFP. The TSCA Program Administrator is the point contact for TSCA compliance issues.
- Actively participate in the development of TSCA compliance programs and operating procedures specific to the needs of the various organizations at RFP.
- Enhance the current TSCA classroom training program and develop a supervisor seminar and TSCA qualification card. Emphasis will be placed in classroom training on a user-friendly application of TSCA requirements.
- Participate in, support, and oversee electrical upgrade projects to ensure compliance to TSCA regulations.
- Develop a current list of PCB and/or potential PCB equipment within the RFP by obtaining the documentation from the organizations responsible for electrical equipment. From the compilation of this data, the TSCA Program Administrator will develop and maintain a centralized PCB records repository.
- Develop and maintain a database from the records repository that will include the status of all PCB electrical equipment.
- Prepare the PCB Annual Document Log for submittal to DOE and EPA. Provide program specific interface with DOE and regional EPA.
- Maintain annual records that include copies of all signed waste manifests generated by the facility during the calendar year, and all cleanup documentation generated during the calendar year.
- Provide program specific support for the various internal organizations responsible for managing TSCA equipments, waste and related issues.
- Examine treatment/disposal alternatives for PCB contaminated wastes and radioactive PCB contaminated wastes.

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4.0 PCB PROGRAM ELEMENTS AND RESPONSIBILITIES

4.1 RFP PCB Inventory

Operations Managers are conducting an inventory in their areas of all PCB Items and potential PCB Items in service or storage for reuse to establish an accurate baseline (**TASK 4**). The PCB inventory will be used to determine PCB Items and contaminated PCB Equipment, to formulate work plans for additional sampling, and to perform a cost analysis of retrofit, replacement or continued use of PCB Equipment. Waste Regulatory Programs is responsible for the maintenance and storage of the PCB inventory records (**TASK 3**), and the development of a PCB database (**TASK 5**). The database will provide an accurate baseline of the quantity and duration of PCB Items in use and storage for reuse from which to assess RFP's compliance to PCB storage and disposal regulations.

Responsible Organization(s)

Operations Managers -
Environmental Restoration
Management -
Maintenance -
Plant Support -
Plant Services -
Analytical Laboratories -

All shall identify PCB materials and equipment within their building/area/operation and report PCB inventory results to Waste Regulatory Programs.

Waste Regulatory Programs - Develop and maintain PCB database from inventory records.

4.2 PCB Use Conditions

The use of PCBs at RFP is being phased out as Transformers and other PCB-containing equipment are replaced. The following conditions for PCB use apply only to equipment which has not yet been replaced, and for which immediate replacement is not feasible.

- Owners/Operators of PCB containing equipment are responsible for informing Waste Regulatory Programs immediately upon discovery of an item which contains PCB that was not previously on the inventory.
- The conditions for PCB use apply to all RFP personnel and contractors who process, distribute, use, or dispose of PCBs or PCB Items. Substances to which this Plan applies include, but are not limited to, PCBs in dielectric fluids, contaminated solvents, oils, waste oils, heat transfer fluids, hydraulic fluids, paints, sludges, slurries, dredge spoils, soils, materials contaminated as a result of spills, and other chemical substances or combination of substances of specified

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PCB concentrations. PCB concentrations may not be diluted, unless otherwise specified, to avoid the requirements set forth in this Plan.

- PCBs must be used in a totally enclosed manner. There are exceptions to the handling of PCBs during maintenance and servicing of equipment.

4.2.1 Use in Transformers

PCBs at any concentration may be used in transformers for the remainder of their useful lives subject to the following conditions.

The use and storage for reuse of PCB Transformers that pose an exposure risk to food or feed is prohibited.

Installation of a retrofilled mineral oil PCB Transformer for reclassification purposes is permitted indefinitely after October 1, 1990. The transformer must be tested 3 months after installation to ascertain the concentration of PCBs.

Combustible materials, including, but not limited to paints, solvents, plastics, paper, and sawn wood must not be stored within a PCB Transformer enclosure (i.e., in a transformer vault or in a partitioned area housing a transformer); within 5 meters of a transformer enclosure, or, if unenclosed (unpartitioned), within 5 meters of a PCB Transformer.

Visual inspections of each PCB Transformer in use or stored for reuse shall be performed as specified in Section 4.3.

In the event a mineral oil transformer, assumed to contain less than 500 ppm of PCBs, is tested and found to be contaminated at 500 ppm or greater PCBs, it will be subject to all the requirements of 40 CFR 761.

Any servicing of PCB Transformers that requires the removal of the transformer coil from the transformer casing is prohibited. PCB Transformers may be serviced at RFP only with dielectric fluid which contain no PCBs.

PCBs removed during any servicing activity must be captured and disposed of in accordance with the regulations. PCBs from PCB Transformers must not be mixed with or added to dielectric fluid from PCB-Contaminated Electrical Equipment.

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4.2.2 Use in Heat Transfer Systems and Hydraulic Systems

Intentionally manufactured PCBs may be used in heat transfer systems and hydraulic systems in a manner other than a totally enclosed manner at a concentration level of less than 50 ppm provided that each system that ever contained PCBs at concentrations above 50 ppm was serviced to reduce the PCB concentration below 50 ppm and tested to show the PCB concentration is less than 50 ppm. Data obtained as a result must be retained for five years after the system reaches 50 ppm.

4.2.3 Use in and servicing of Electromagnets, Switches, and Voltage Regulators

PCBs at any concentration may be used in electromagnets, switches, and voltage regulators for the remainder of their useful lives, subject to the following conditions:

The use and storage for reuse of any electromagnet which poses an exposure risk to food or feed is prohibited if the electromagnet contains greater than 500 ppm PCBs.

Servicing any electromagnet, switch, or voltage regulator with a PCB concentration of 500 ppm or greater which requires the removal and rework of the internal components is prohibited.

Electromagnets, switches, and voltage regulators classified as PCB-Contaminated Electrical Equipment may be serviced at RFP only with non-PCB dielectric fluid.

4.2.4 Use in PCB Large High Voltage Capacitors and PCB Large Low Voltage Capacitors

PCBs at any concentration may be used in capacitors, subject to the following conditions:

The use of PCB Large High Voltage Capacitors and PCB Large Low Voltage Capacitors which pose an exposure risk to food or feed is prohibited.

In addition, the use of PCB Large High Voltage Capacitors and PCB Large Low Voltage Capacitors is prohibited unless the capacitor is used within a restricted-access electrical substation or in a contained and restricted-access indoor installation. A restricted-access electrical substation is an outdoor, fenced, or walled-in facility that restricts public access and is used in the transmission or distribution of electric power. A covered and restricted-access indoor installation does not have public access and has an adequate roof, walls, and floor to contain any release of PCBs within the indoor location.

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4.2.5 Use in and Servicing of Circuit Breakers, Reclosers, and Cable

PCBs at any concentration may be used in circuit breakers, reclosers, and cable for the remainder of their useful lives provided the equipment at RFP is serviced only with non-PCB dielectric fluids.

4.2.6 Testing and Reclassification of PCB Equipment

From data collected in the PCB Equipment inventory, Waste Regulatory Programs will develop a plan for the sampling of potential or known PCB-containing equipment which currently does not have defensible data. The data will be used to determine a course of action: continued use of the equipment, replacement or reclassification. Federal regulations permit PCB-containing equipment reclassification through the use of specific criteria. **(TASK 1)**

Responsible Organization(s)

Engineering - Responsible for the design and change control of equipment used to modify or replace existing PCB-containing electrical equipment.

Owners/Operators of PCB-containing equipment - Comply with PCB use conditions until equipment is replaced.

Waste Regulatory Programs - Provide assistance to owners/operators of PCB-containing equipment to ensure regulatory compliance. Coordinate the testing of PCB-containing equipment for reclassification.

4.3 Transformer and Storage Area Inspections

4.3.1 General Inspection Requirements

Written, controlled procedures shall be used to perform the inspections. All PCB inspection procedures must be submitted to Waste Regulatory Programs for review and concurrence. Inspection procedures shall address, at a minimum, what must be examined during inspections, whether the appropriate markings are present, whether maintenance of equipment appears to be needed, how to perform the inspection, and how to record and report inspection results. Procedures shall include definition of nonconforming conditions, and guidance for inspectors when inspections cannot be performed due to unfavorable conditions (adverse weather, restricted access, etc.). **TASK 10**

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In addition, procedures developed for PCB Transformer inspections must include instructions for recording the following information:

- The location of the Transformer.
- The date of each visual inspection.
- The person performing the inspection.
- If a leak is discovered, the date and time that the discovery was made.
- The location of any leak(s).
- An estimate of the amount of dielectric fluid released from any leak.
- The date of any cleanup, containment, repair, or replacement.
- A description of any cleanup, containment, or repair performed.
- A description of any containment and daily inspection required for uncorrected active leaks.

Waste Regulatory Programs must be notified within 24 hours of any nonconforming conditions detected during the inspection. Waste Regulatory Programs shall consult with Operations Managers or the owners of equipment regarding corrective action.

Copies of all inspection reports shall be submitted to Waste Regulatory Programs no later than 10 calendar days after the inspection. Original inspection records shall be maintained indefinitely by the organization performing inspections. A comprehensive inspection record file shall be maintained and periodically evaluated by Waste Regulatory Programs.

4.3.2 PCB Transformer Inspections

Visual inspections of PCB Transformers in use or stored for reuse shall be conducted quarterly, with at least 30-days between inspections. These inspections may take place any time during the 3-month periods: January-March, April-June, July-September, and October-December as long as there is a minimum of 30 days between inspections. The visual inspection must include investigation for any leak of dielectric fluid on or around the transformer. The extent of the visual inspections will depend on the physical constraints of each transformer installation and should not require an electrical shutdown of the transformer being inspected.

A reduced visual inspection frequency of at least once every 12 months applies to PCB Transformers that utilize either of the following risk reduction measures. These inspections may take place any time during the calendar year as long as there is a minimum of 180 days between inspections.

- A PCB Transformer which has impervious, undrained, secondary containment

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capacity of at least 100 percent of the total dielectric fluid volume of all transformers so contained, or

- A PCB Transformer which has been tested and found to contain less than 60,000 ppm PCBs (after 3 months of in service use if the transformer has been serviced for purposes of reducing the PCB concentration).

An increased visual inspection frequency of at least once every week shall be applied to any PCB Transformer in use or stored for reuse which is found to pose an exposure risk to food or feed.

Leaking PCB Transformers shall be inspected daily. A Transformer is considered to be leaking when any quantity of PCBs has been released from the unit. Leaked PCBs must be contained to prevent exposure of humans or the environment and leaks must be corrected within 48 hours of detection. Reference Section 4.8 for information on spill cleanup. PCB Transformer leak repairs shall be inspected and verified as adequate. A copy of the repair inspection and a certification of completion must be submitted to Waste Regulatory Programs within 24 hours of the verification of repair.

4.3.3 PCB Storage Area Inspections

Equipment and PCB waste containers stored in an approved PCB storage area shall be inspected for leaks every 30 days. (See Section 4.14 for storage area requirements). Any leaking PCB Articles and PCB Containers and their contents shall be transferred immediately to properly marked non-leaking containers. Any spilled or leaked materials shall be immediately cleaned up in accordance with Section 4.8.

PCB Large High Voltage Capacitors and PCB-Contaminated Electrical Equipment (non-drained) which are temporarily stored in an area not meeting PCB storage area criteria must be inspected weekly. On a quarterly basis, overpack drums which are used as secondary containment shall be opened and the inside of the overpack shall be inspected for leaks (see Section 4.12.3, Overpack Drums).

Responsible Organization(s)

Owners/Operators of PCB Transformers and/or storage areas - Conduct inspections per requirements of this Plan. Report inspection results to Waste Regulatory Programs.

Waste Operations - Inspection of PCB waste containers and PCB waste storage areas. Develop PCB storage area inspection procedures. Forward inspection results to Waste Regulatory Programs.

Waste Regulatory Programs - Evaluate and store inspection records. Provide

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guidance to organizations responsible for developing inspection procedures to ensure regulatory issues are addressed.

4.4 Procurement

All items and equipment (drums, containers, liners, labels, etc.) used for the handling, containerization, labeling, storage, and shipment of PCB wastes are managed in accordance with RFP Waste Requirements Manual, and procured in accordance with the RFP Quality Assurance Manual and the Site Quality Assurance Manual.

There are currently no contracts in place at RFP which allow for emergency services to be performed for PCB related jobs which may affect environmental compliance. The Spill Cleanup Policy under TSCA contains several requirements for immediate decontamination and cleanup of PCB spills. EG&G personnel will initialize cleanup and decontamination as required by the regulations. However, in some instances where large spills have occurred, environmental remediation or further decontamination and cleanup may require the use of a subcontractor. TSCA regulations state that in these instances, the responsible party must show good faith efforts to complete decontamination and cleanup. Therefore, consideration should be given to the procurement of a qualified subcontractor to be brought in on an emergency basis for work to be performed on PCB related issues. The contract would not necessarily be project specific, but specific to PCB situations which are beyond the capabilities of the EG&G organizations. The procurement of a subcontractor for these types of situations will allow for expedient cleanup and decontamination of those jobs, incidents, or spills that cannot be completed by EG&G personnel (TASK 19).

Procurement of subcontractors to perform PCB related work requires input from several disciplines to ensure compliance to TSCA regulations are addressed in the Statement of Work. TSCA disposal sites are selected from the recommendations of the RFP Treatment Storage and Disposal Facilities (TSDF) Site Assessment Team.

Responsible Organization(s):

Procurement Quality Engineering - Procurement of TSCA-related services, equipment, and waste disposal company contracts.

Waste Regulatory Programs - Furnishes specifications and acceptance criteria to Procurement Quality Engineering for TSCA-related service, supplier, and waste disposal contracts. Review and approval of all TSCA-related service, supplier, and waste disposal company contracts.

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4.5 Equipment, Storage Area, and Transformer Marking

4.5.1 General Marking Requirements

Marks shall be sufficiently durable to equal or exceed the life of the PCB Item and shall be placed in a position so that the marks can be easily read by any persons inspecting or servicing the marked items.

Thirty-day, quarterly, and annual inspections are the mechanisms used to ensure that appropriate markings are in place and visible for all PCB Items, PCB Transformer locations, storage areas, and waste containers. Inspection records shall indicate whether the appropriate markings are present and in good condition.

PCB Labels are supplied by Waste Regulatory Programs. It is the responsibility of Waste Regulatory Programs to ensure that the stock of PCB labels is adequate.

4.5.2 Marking PCB Items

Small capacitors manufactured after July 1, 1978 that do not contain PCBs will be marked by the manufacturer with the statement, "No PCBs". All small capacitors at RFP without this marking shall be assumed to contain PCBs.

Each of the following items shall be marked with the PCB label shown in Attachment 1 if they contain 50 ppm PCBs or greater:

- PCB Containers (see Section 4.12 for marking of PCB waste containers)
- Electric motors using PCB coolants
- Hydraulic systems using PCB hydraulic fluid
- Heat transfer systems using PCBs

Each of the following items shall be marked with the PCB label shown in Attachment 1 if they contain 500 ppm PCBs or greater:

- PCB Transformers
- PCB Large High Voltage Capacitors
- Poles, structures, or fences which enclose one or more PCB Large High Voltage Capacitors
- PCB Large Low Voltage Capacitors (at time of removal from use)
- PCB Article Containers containing any of the above articles or equipment

NOTE: Where a PCB Label is required, but the label in Attachment 1 is too large for the size of the item, contact Waste Regulatory Programs for guidance.

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4.5.3 Storage Area Marking

Each storage area used to store PCBs and PCB Items for disposal shall be marked with the PCB label shown in Attachment 1. The PCB label shall be applied to all doors which provide access to the storage area. If the storage area is fenced or roped off, the PCB label shall be applied to each side of the fence that surrounds the storage area. If the storage area is unfenced in a room used for more than one purpose, the perimeter of the storage area shall be marked on the floor with tape or paint, and the PCB label shall be posted on floor stands at each corner of the storage area.

Temporary storage areas shall be marked with the PCB label shown in Attachment 1. The labels shall be placed in a visible location (i.e. on the wall or a floor stand), but marking of the floor is optional.

4.5.4 Transformer Location Markings

Vault doors, machinery room doors, fences, hallways, or any means of access to a PCB Transformer shall be marked with the PCB label shown in Attachment 1. The label shall be applied in a manner that can be easily read by emergency response personnel.

Responsible Organization(s)

Owners/Operators of PCB-containing equipment, containers, or storage areas - Ensure appropriate markings are in place and visible for all PCB Items, PCB Transformer locations, waste containers, and storage areas within their building or areas.

Waste Regulatory Programs - Maintain adequate supply of PCB labels. Provide guidance to owners/operators regarding PCB marking requirements.

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4.6 Equipment Maintenance and Servicing

4.6.1 General Maintenance/Servicing Requirements

Maintenance/service records of all equipment containing PCBs in concentrations of 50 ppm or greater shall be kept in a central location. Copies of PCB equipment maintenance/service records shall be forwarded to Waste Regulatory Programs. At a minimum, maintenance/service records shall contain the following information:

- Equipment description and ID number.
- Date first put in service.
- Current location of equipment. (Former location(s) of equipment, if applicable)
- Required maintenance/service interval.
- Date and time of maintenance/service (when begun, when completed)
- Work Order or Maintenance Request Number.
- Name of personnel performing maintenance or service.
- Type of maintenance/service performed. (Preventative [routine] maintenance, repair, safety-related maintenance, corrective action response).
- The operations performed. (Replaced gasket, drained fluid, etc.)
- Last test date for PCB concentration.
- Comments/considerations/concerns that may affect future maintenance/service schedules or activities for this equipment.
- Maintenance/service completion verification signature.

4.6.2 Maintenance

Maintenance of PCB equipment may include periodic lubrication of equipment parts, replacement of worn parts, and performance checks. Maintenance shall be performed on an as-needed basis. Inspectors shall initiate a work order or maintenance request for any PCB equipment maintenance needs identified during the inspection and recorded on the inspection report. A copy of the work request must be forwarded as soon as practical to Waste Regulatory Programs.

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4.6.3 Servicing

PCB Transformers shall be serviced annually. PCB Transformer servicing involves the addition of dielectric fluid to the unit. PCB Transformers at RFP may be serviced with non-PCB dielectric fluid only. Any servicing of PCB Transformers that requires the removal of the transformer coil from the transformer casing is prohibited.

A PCB Transformer may be converted to PCB-Contaminated Electrical Equipment or to a non-PCB Transformer and a transformer that is classified as PCB-Contaminated Electrical Equipment may be reclassified to a non-PCB Transformer by draining, refilling and/or otherwise servicing the transformer.

Servicing any electromagnet, switch, or voltage regulator with a PCB concentration of 500 ppm or greater which requires the removal and rework of the internal components is prohibited. Electromagnets, switches, or voltage regulators may be serviced with non-PCB dielectric fluid only.

PCBs removed during any servicing activity must be captured and disposed of in accordance with Section 4.12 of this Plan. PCBs from PCB Transformers must not be mixed with or added to dielectric fluid from PCB-Contaminated Electrical Equipment.

Responsible Organization(s)

Operations Managers - Plan, schedule and control PCB-associated maintenance activities. Provide resources for PCB-related maintenance activities within their assigned areas or buildings.

Owners/operators of PCB Equipment - Employ subcontractors for routine servicing of PCB Equipment. Generate and maintain original PCB servicing records. Forward copies of servicing records to Waste Regulatory Programs.

Maintenance - Perform PCB Equipment maintenance and repair as needed. Generate and maintain original PCB maintenance records. Forward copies of PCB maintenance records to Waste Regulatory Programs. Dispose of PCB waste in accordance with Section 4.12 of this Plan.

Waste Regulatory Programs - Maintain centralized storage of PCB equipment servicing and maintenance records.

4.7 Emergency/Spill Response

4.7.1 Fire Protection

Waste Regulatory Programs must register PCB Transformers with the RFP Fire Department. The following minimum information must be provided:

- Description of the physical location of all PCB Transformers.
- The principal constituent of the dielectric fluid in the Transformers (e.g., mineral oil, PCBs, or silicone oil).
- The name and telephone number of the person to contact in the event of a fire involving the equipment.

4.7.1.1 If a PCB Transformer is involved in a fire-related incident, a WRP Spill Response Representative must immediately report the incident to the Occurrence Notification Center, who in turn will notify the National Response Center. Information must be provided regarding the type of PCB Transformer installation involved in the fire-related incident and the readily ascertainable cause of the fire-related incident.

4.7.1.2 Additional guidance for Emergency Response personnel on fire-related PCB incidents shall be proceduralized and appended to this Plan. **TASK**

1 1

4.7.2 Spill Response

For the purposes of this Plan, a 'spill' means both intentional and unintentional spills, leaks, and other uncontrolled discharges where the release results in any quantity of PCBs running off or about to run off the external surface of the equipment or other PCB source, as well as the contamination resulting from those releases. This applies to spills of 50 ppm or greater PCBs. The concentration of PCBs spilled is determined by the PCB concentration of the spilled solution (as opposed to the PCB concentration of the material contaminated by the spill). Where a spill of untested mineral oil occurs, the oil is presumed to contain greater than 50 ppm, but less than 500 ppm PCBs and is subject to the PCB Reporting and Clean-up sections of this Plan.

4.7.2.1 Any employee who becomes aware of a suspected PCB release shall immediately report the release to his/her supervisor. If immediate notification of employee's supervisor is not possible, the employee shall notify the Shift Superintendent on extension 2914. Section 4 of the Hazardous Waste Requirements Manual addresses the notification sequence and appropriate response for a spill.

- 4.7.2.2 Initial responses to releases are coordinated through the Shift Superintendent's office. The Shift Superintendent determines if the Fire department Hazardous Materials Response Team (FD HMRT) is required for initial control and containment of the release. The Shift Superintendent coordinates the actions of the organization responsible for the release and determines if a survey by Radiation Protection Technologists is necessary. The Shift Superintendent shall consult with the designated "on call" Spill Response Representative from Waste Regulatory Programs to determine immediate responses.
- 4.7.2.3 The Spill Response Representative shall contact the Waste Regulatory Programs TSCA Program Administrator as soon as possible. When required, the "on call" Spill Response Representative shall direct the Occurrence Notification Center (ONC) to notify the appropriate agency(s) (DOE, EPA, CDH, and/or The National Response Center) of the release. Where more than one requirement under other Federal statutory authority applies for the reporting of spills, the stricter standards must be met. The Notification Criteria is outlined in the Spill Response and Reporting Manual.
- 4.7.2.4 Additional guidance for Spill Response personnel shall be proceduralized and appended to this Plan. **TASK 11**

Responsible Organization(s)

Note: Organizational responsibilities for emergency and spill response are addressed in the text portion of the Spill Reporting section.

4.8 Spill Cleanup

4.8.1 General Requirements

Guidance for PCB spill cleanup shall be developed and appended to this Plan. In the interim, spill cleanup criteria will be determined on a case-by-case basis by Waste Regulatory Programs, Industrial Hygiene, and Environmental Restoration Management in accordance with TSCA requirements. Contaminated soils, solvents, rags, and other materials resulting from the cleanup of PCBs shall be managed in accordance with Section 4.12 of this Plan. **TASK 11**

Either qualified building personnel or subcontractors shall be utilized to perform cleanup operations that meet spill cleanup requirements.

Postcleanup sampling is required to verify the level of cleanup under the regulations.

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Weekly progress reports on cleanup operations must be submitted to Waste Regulatory Programs.

4.8.2 Cleanup of low-concentration PCB spills of less than 1 pound

Cleanup of low-concentration (<500 ppm PCBs) spills which involve less than 1 pound of PCBs by weight (or less than 270 gallons of untested mineral oil) must be completed within 48 hours after discovery of the spill. This involves:

- Double washing/rinsing of solid surfaces.
- Excavation of all soil within the spill area out to 1 lateral foot around all visible traces.
- Backfilling of excavated area with clean soil to restore area to its original configuration.

4.8.3 Cleanup of all high-concentration PCB spills, or low-concentration spills of 1 pound or greater

Cleanup of all high-concentration (>500 ppm PCBs) spills, or low-concentration PCB spills of 1 pound or greater must be achieved promptly in accordance with TSCA regulations. Cleanup criteria will be determined on a case-by-case basis by Waste Regulatory Programs, Industrial Hygiene, and Environmental Restoration Management in accordance with TSCA requirements.

4.8.4 PCB Spills occurring after May 4, 1987

All releases \geq 50 parts per million (ppm) of PCBs occurring on or after May 4, 1987 are subject to the cleanup requirements specified in the TSCA regulations. The TSCA Program Administrator within Waste Regulatory Programs has the authority to declare PCB spills occurring on or after May 4, 1987, as emergencies in order to expedite cleanup activities to meet regulatory requirements.

4.8.5 PCB Spills that have occurred prior to May 4, 1987

Releases of PCBs that have occurred prior to May 4, 1987 are managed on a case by case basis. Each site suspected of PCB contamination from past spills shall be evaluated and decontaminated to requirements established at the discretion of the EPA regional offices. In these cases, EG&G will provide recommendations to the Department of Energy (DOE) for subsequent submittal to EPA Region VIII.

Responsible Organization(s)

Environmental Restoration Management - Consult with Waste Regulatory Programs and interface with regulatory agencies on prior PCB spills to determine remediation

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criteria. Provide guidance on restoration of PCB-contaminated Individual Hazardous Substance Sites.

Industrial Hygiene - Conduct pre- and post-cleanup smear sampling. Determine proper personal protective equipment for cleanup situations.

Operations Managers - Consult with Industrial Hygiene, Environmental Restoration, and Waste Regulatory Programs to determine spill cleanup requirements. Assign personnel and/or employ subcontractors to cleanup operations. Inform Waste Regulatory Programs weekly of progress on cleanup operations.

Waste Regulatory Programs - Develop spill cleanup procedure. Consult on spill cleanup requirements determination. Monitor cleanup operations.

4.9 Spill Cleanup Documentation

A complete and accurate record of cleanup actions must be documented and, upon completion of cleanup, must be provided to Waste Regulatory Programs. The record of events that verify the completion of PCB spill cleanup (see Attachment 7, PCB Spill Cleanup Report) shall be kept by the responsible organization and a copy sent to Waste Regulatory Programs within ten days of completion of cleanup. Both the original and the copy of the record shall be kept indefinitely.

Responsible Organization(s)

Operations Managers - Documentation of spill clean-up actions and clean-up verification. Submit copies of Spill Cleanup Reports to Waste Regulatory Programs.

Waste Regulatory Programs - Maintenance and storage of spill clean-up records.

4.10 PCB Decontamination

Note: Solvents containing any concentration PCBs are prohibited for use as decontamination solutions.

4.10.1 Containers

Internal surfaces of containers must be flushed three times with a non-PCB decontamination solvent (such as hexane). Each rinse shall use a volume of equal to approximately ten percent of the PCB container capacity. The solvent may be reused for decontamination until it contains 50 ppm PCBs. All used PCB decontamination solvent must (regardless of whether or not it reaches a concentration of 50 ppm) must be managed as waste according to Section 4.12, and disposed of as liquid PCBs in accordance with Section 4.15 of this Plan.

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4.10.2 Moveable equipment used in storage areas

Moveable equipment used in storage areas shall be decontaminated by swabbing surfaces that have contacted PCBs with a non-PCB solvent prior to being removed from the storage area.

Responsible Organization(s)

Owners/operators of PCB-Containers and Equipment - Perform decontamination of materials in accordance with PCB Decontamination section of this Plan.

4.11 Environmental Remediation

The planned remediation of several suspect PCB sites at RFP has been initiated by the collection of historical information as part of a site wide Assessment of Known, Suspect, and Potential Environmental Releases of PCBs. The original assessment identified 35 suspect sites throughout RFP, and eventually added one more site for a total of 36 sites. These sites have since been incorporated into the RFP Historical Releases Report.

EG&G submitted analytical data for the 36 sites to the DOE who forwarded the information to the individual agencies; the EPA and CDH have requested the disposition of 29 potential or known sites. Environmental Restoration Management is currently interfacing with the agencies to determine the disposition of the remaining 29 sites for remediation. It is not known at this time if these sites will be cleaned up under TSCA regulations, or incorporated into the Inter-Agency Agreement (IAG). Incorporation of these sites into the IAG will require cleanup to meet CERCLA requirements.

Responsible Organization(s)

Environmental Restoration Management - Interface with WRP, DOE, EPA, and CDH for disposition of 29 suspect or known PCB sites.

Waste Regulatory Programs - Support as requested from Environmental Restoration Management.

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4.12 Waste Generation

Note: If radioactive PCB waste is encountered, please contact Waste Regulatory Programs. TASK 12

4.12.1 Waste Characterization

Waste streams are identified and characteristics documented using the Waste Stream and Residue Identification and Characterization (WSRIC) building book, Waste Information Sheets, Material Safety Data Sheets, Waste Generator On-the-Job Training documentation, or written instructions from the Waste Technical Support group. If the waste to be generated is not properly characterized in WSRIC, a Non-Routine Waste Origination Log must be completed.

Wastes from PCB spill cleanup operations shall be characterized by process knowledge. Assistance may be obtained by contacting Waste Regulatory Programs.

4.12.2 Waste Packaging and Documentation Requirements

The following requirements must be met when packaging PCB waste:

- Packaging to WP-1027, Non-Radioactive Waste Packaging; WO-1100, Solid Radioactive Waste Packaging Inside the PA; WO-1101, Solid Radioactive Waste Packaging Outside the PA; WO-1102, Waste Residue Traveler Instructions;
- Use of current Waste/Residue Traveler or Waste Processing Request form;
- Use of PCB label (see Attachment 1);
- Generators shall be trained and qualified in waste handling courses as specified in Section 4.19.

PCB wastes are to be identified, marked, handled, stored and segregated from each other on the basis of RMMA/non-RMMA classification. Radiological Engineering shall be contacted prior to removal and/or demolition of any areas or items containing PCB wastes to obtain RMMA/Non-RMMA waste classification. PCB wastes generated in areas, rooms, or buildings identified as RMMAs shall be segregated from wastes generated in areas, buildings or rooms identified as Non-RMMAs.

NOTE: An exception to the training requirement above is allowed for certain subcontractor generated wastes. Long term subcontractors routinely handling wastes must comply with all requirements of Section 4.19 (Training). Short-term contractors may package wastes without attending the waste handling courses only if a Facilities Engineering (FE) Construction Coordinator, trained and qualified in waste handling is present for the entire packaging operation. In this case, the FE Construction Coordinator is responsible for proper waste segregation and affirms this by signature on the Traveler.

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4.12.3 Overpack drums

If PCB waste drums show evidence of damage or decay, they may be overpacked in a 83/85 gallon capacity 16-gage steel drum with removable head. The overpack drum is not to be used as a standard packaging container unless the damage/decay conditions exist.

In addition, as approved by EPA Region VIII, overpack drums may be used as secondary containment in fissile material handling areas where the use of the six inch curb is prohibited for nuclear safety reasons. In addition to the 30-day inspection requirement for storage areas, the overpack drum must be opened and inspected quarterly (see Attachment 6, PCB Internal Overpack Inspection Log). A copy of the inspection log must be forwarded to Waste Regulatory Programs within 10 calendar days.

Responsible Organization(s)

Radiation Protection - Survey PCB waste containers for surface alpha, surface beta, and penetrating neutron and gamma radiation when necessary.

Waste Assay and Shipping - Prepare and issue waste containers for transfer to generators.

Waste Generator - Identify, mark, handle, store, and segregate PCB wastes from non-PCB waste. Handle and package all PCB wastes generated in a safe manner and in accordance with applicable RFP procedures. Certify by signature on the Waste/Residue Traveler that all PCB waste generated is properly identified, segregated, and characterized according to applicable written guidance and procedures.

Waste Identification and Characterization - Maintain the content and accuracy of WSRIC building books when revision requests are received by generator organizations. Administer the RFP waste stream sampling and analysis program.

Waste Regulatory Programs - Provide guidance to waste generator organizations and Operations Managers upon request.

Owners/Operators of TSCA Storage Areas - Open and inspect overpack drums as required.

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4.13 Waste Management

4.13.1 Waste and Environmental Management System (WEMS)

The WEMS is used, in part, as a computer database for the storage, and management of data related to PCB waste containers, and is administered and maintained by the WEMS Programs Management (WPM) group.

TSCA waste container identification numbers are initially entered into WEMS by a WEMS Coordinator when the drum is issued. Information obtained from the Waste/Residue Traveler, the drum label or the waste box label (whichever one is present) is also entered as appropriate. The WEMS system is programmed to flag entries which indicate that PCB waste containers have been in temporary storage for 20 days. The WEMS PCB waste print-out shall be forwarded monthly to Regulated Waste Operations and weekly to Waste Regulatory Programs to ensure that PCB waste drums are shipped to the disposal site prior to the regulatory limit of 9 months.

Responsible Organization(s)

Regulated Waste Operations - Verify each PCB waste container for current WEMS status. If needed, updated WEMS data for PCB waste containers that have not been statused by the WEMS coordinator.

Waste Assay and Shipping - Perform WEMS system data entry for PCB waste containers.

Waste Programs Information Management - Issue PCB WEMS reports to Waste Operations and Waste Regulatory Programs.

Waste Regulatory Programs - Monitor WEMS PCB reports to ensure that PCB wastes are shipped off-site for disposal within regulatory time frame.

4.14 Storage for Disposal

The storage for disposal requirements apply to PCBs at concentrations of 50 ppm or greater and PCB items with PCB concentrations at 50 ppm or greater, with the exception of PCB fluorescent light ballasts which are only regulated under CERCLA for disposal (PCB fluorescent light ballasts may be packed in gray drums if non-radioactive or white drums if radioactive).

4.14.1 General Storage Requirements

Inspections (see Section 4.3) shall ensure that the PCB storage area criteria is met. If an operator of a PCB storage area is unable to comply with the requirements identified in the following sections, or if noncompliant conditions are discovered during an inspection, notification must be made to Waste Regulatory Programs immediately.

Waste Regulatory Programs shall work with storage area operators in the initiation of work orders to bring the storage area into compliance.

The date that PCB Articles and PCB Containers were placed in storage shall be annotated with a permanent marker on the PCB label affixed to the article or container. PCB storage areas must be managed so that the PCB Articles and Containers can be located by the date they entered storage.

PCB storage areas must be marked in accordance with Section 4.5.3 of this Plan.

Any item of moveable equipment that is used for handling PCBs and PCB Items in the storage facilities that comes in direct contact with PCBs shall be decontaminated in accordance with Section 4.10 of this Plan prior to being removed from the storage facility.

4.14.2 Regulated PCB Storage (longer than 30 day-temporary storage)

A TSCA Storage Area Form (see Attachment 3) is to be completed by storage area owners and forwarded to Waste Regulatory Programs for requests for new storage areas or changes to custodian information.

Facilities used for the storage of PCBs and PCB items designated for disposal must meet the following criteria:

- Adequate roof and walls to prevent rain water from reaching the stored PCBs and PCB items.
- An adequate floor which has continuous curbing with a minimum six-inch high curb. The floor and curbing must provide a containment volume equal to at least two times the internal volume of the largest PCB Article or PCB Container stored therein, or 25 percent of the total internal volume of all PCB Articles or PCB Containers stored therein, whichever is greater; EXCEPTION: In fissile material handling areas, the use of a 6 inch curb is not allowed due to nuclear safety concerns. In these cases, the EPA Region VIII has approved the use of overpack drums as secondary containment (see Section 4.12.3);
- No drain valves, floor drains, expansion joints, sewer lines, or other openings

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that would permit liquids to flow from the curbed area;

- Floors and curbing constructed of continuous smooth and impervious materials, such as Portland cement concrete or steel, to prevent or minimize penetration of PCBs;
- Not located at a site that is below the 100-year flood water elevation.

4.14.3 Temporary PCB Storage (up to 30 days)

Specific PCB Items may be stored temporarily in an area that does not comply with permanent storage requirements for up to thirty days from the date the waste was first placed in the drum. A PCB Temporary Storage Authorization form (See Attachment 2) must be completed by the waste generator, and must be signed by the Building Manager, Waste Regulatory Programs, and the Hazardous Waste Operations Manager. The Authorization form must be affixed to the waste container.

Items approved for 30-day temporary storage are:

- Non-leaking PCB Articles and PCB Equipment;
- Leaking PCB Articles and PCB Equipment if the PCB Items are placed in a non-leaking PCB Container that contains sufficient sorbent materials to absorb any liquid PCBs remaining in the PCB Items;
- PCB Containers holding non-liquid PCBs such as contaminated soil, rags, and debris;
- PCB Containers containing liquid PCBs at a concentration between 50 and 500 ppm, provided a Spill Prevention, Control and Countermeasure Plan has been prepared for the temporary storage area.

Responsible Organization(s)

Regulated Waste Operations - Assist waste generators responsible for 30-day PCB storage.

Storage Area Owners/Operators - Maintain regulated PCB waste storage areas. Complete TSCA Storage Area Form as required and submit to Waste Regulatory Programs.

Waste Generators - Obtain authorization for and maintain 30-day PCB storage areas in accordance with this Plan. Forward copy of authorization to Waste Regulatory Programs upon receipt of approval signatures. Initiate movement of PCB waste containers from 30-day storage areas to regulated PCB storage areas within 30 days.

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Waste Regulatory Programs - Monitor PCB waste containers in storage to ensure that regulatory time limits are not exceeded. Assist temporary storage area operators in the development of a Spill Prevention, Control, and Countermeasure Plan if needed.

4.15 Disposal

All nonradioactive PCB waste generated at RFP is disposed of by incineration. Alternatives to incineration are permitted by regulation for some PCB wastes. Waste Regulatory Programs may consider alternative means of disposal (e.g., chemical waste landfill, high efficiency boiler) if timely incineration of waste is not possible, or incineration is not practical.

The disposal facility must receive PCB waste on a date less than nine months from the date the PCBs were removed from services for disposal. Disposal of PCB waste must take place within 12 months of waste generation. To ensure that PCB waste generated and stored at RFP meets regulatory limits, waste must be shipped to the disposal facility within 9 months. (See Section 4.11, Waste Management).

PCB disposal facilities employed by RFP must have an EPA Identification number. PCB disposal TSDF(s) employed by EG&G Rocky Flats shall be audited for adherence to federal, state, and local regulations.

See Section 4.18 for information regarding Certificates of Disposal.

Responsible Organization(s)

TSDF Assessment Team - Develop audit criteria for PCB TSDF(s). Audit TSDF(s) employed by RFP for adherence to federal, state, and local regulations. Report audit results to RFP management and forward copy of report to Waste Regulatory Programs.

Waste Regulatory Programs - Provide technical guidance for disposition of waste and audit criteria. Maintain copies of TSDF audit reports.

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4.16 Transportation

4.16.1 On-Site Transfer

On-site transfers of PCB Items, Containers, or Equipment shall be coordinated with the RFP Traffic Department, and must be managed in accordance with the On-Site Transportation Manual.

4.16.2 Off-Site Shipment Preparation

Prior to off-site shipment, data for PCB waste containers shall be verified as complete, accurate, and correct in WEMS. This verification includes the resolution of any discrepancies between the data in WEMS and the data shown on the documentation accompanying the waste container.

Non-liquid PCB waste containers shall be examined by Real Time Radiography (RTR) for verification and assurance that container contents meet disposal-site criteria and Department of Transportation requirements. Rejected drums shall be transferred back to the waste generator for repackaging.

4.16.3 Off-Site Shipment

Off-Site shipments of PCB waste shall be coordinated with the RFP Traffic Department. RFP personnel must adhere to 49 CFR 100-179 for controlling, labeling, and marking when preparing PCBs for shipment. EPA Form 8700-22 shall be used to manifest PCB waste shipments in accordance with 40 CFR 761.207.

Copies of all PCB waste manifests, and Certificates of Disposal shall be forwarded to Waste Regulatory Programs. The manifests and Certificates of Disposal are used by Waste Regulatory Programs to prepare the Annual Document Log (see Section 4.18, Records and Reporting).

Responsible Organization(s)

Regulated Waste Operations - Inspect, store, and mark PCB waste containers for shipment to disposal sites. Perform technical review and approval of PCB waste managed by subcontractors. Request total alpha and total beta analysis of PCB waste prior to off-site shipment for disposal, if necessary. Mark and label PCB waste containers per DOT requirements. Prepare and stage PCB waste containers for off-site shipment.

Traffic Department - Ensure all PCB waste shipments are properly classified, packaged, marked, labeled, and shipped in compliance with 49 CFR. Prepare PCB waste manifests, bills of lading, and other shipping documentation. Ensure manifests are returned and retained in accordance with applicable regulations. Ensure

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Certificates of Disposal are received. Provide certification of PCB waste shipment through inspection of loads documentation, labeling, etc. Forward copies of PCB waste manifests and Certificates of Disposal to Waste Regulatory Programs.

Waste Assay and Shipping -Arrange for on-site transfer of rejected waste containers to responsible generators for repackaging.

Waste Regulatory Programs - Maintain records of all PCB waste manifests and Certificates of Disposal for Annual PCB Log.

4.17 Surveillance/Audits/Assessments

4.17.1 General Requirements

Surveillances, audits, and assessments shall be conducted in accordance with the Quality Assurance Manual or the Performance Assurance Manual, as applicable. TSCA Program, operations, and functional managers are required to provide surveillance, audit, and assessment personnel free access to documents, work areas, personnel, and supervision during related activities.

A copy of TSCA-related surveillance, audit, and assessment results shall be forwarded to affected organizations and to Waste Regulatory Programs upon completion of the report. Findings, concerns, and observations noted shall be submitted to Issues Management for evaluation and risk-ranking.

4.17.2 Surveillance

A minimum of two surveillances per calendar year shall be conducted of floor-level compliance to the TSCA Management Plan and implementing procedures. Surveillance topics may be requested by Waste Regulatory Programs in order to obtain information about suspected deficiencies, to verify program implementation, or to confirm completion of corrective actions for previously identified deficiencies.

4.17.3 Audits

A minimum of one audit per calendar year shall be conducted of TSCA program management adherence to applicable federal and state regulations, Quality Assurance requirements, and/or EG&G Rocky Flats Plant policies.

4.17.4 Assessments

Periodic assessments shall be conducted to evaluate the effectiveness of TSCA Program management, program elements, and program activities.

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4.17.5 Corrective Action

Organizations found to have noncompliant conditions may be tasked by Issues Management to complete an Action Plan for corrective action. Corrective actions may be entered in and tracked on the Plant Action Tracking System. Nonconformance Reports may be issued for items identified as nonconforming to RFP policies and procedures to prevent their inadvertent use or disposal. Significant conditions adverse to quality may result in the issuance of a Corrective Action Request, Deficiency Report, and/or Stop Work Order.

Responsible Organization(s)

Owners/Operators of PCB-containing equipment, containers, or storage areas - Perform necessary corrective actions in such a manner as to prevent recurrence of nonconforming condition.

Standards, Audits, and Assurance - Assignment, development, and performance of surveillances, audits, and assessments. Reporting results of the former to affected organizations and Waste Regulatory Programs. Evaluation and risk-ranking of findings, concerns, and observations for assignment of corrective action. Tracking and trending of noncompliance issues and conditions.

Waste Regulatory Programs - Provide assistance to affected organizations to remedy noncompliant conditions and determine corrective action as necessary.

4.18 Records and Reporting

All records and reports identified below shall be maintained indefinitely in a centralized storage area by Waste Regulatory Programs, and upon request shall be made available to EPA for inspection. PCB records and reports shall be maintained as Quality Assurance Records in accordance with QR-17, Quality Assurance Records, and DOE Order 1324.2, Records Disposition.

4.18.1 Inspection and Maintenance Records

Inspection records include PCB Transformer, PCB storage area, and PCB waste container inspections.

4.18.2 Spill Cleanup Records

Spill cleanup records include PCB cleanup reports, sampling plans, pre- and post-cleanup sampling results.

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4.18.3 Exception Reports

4.18.3.1 Exception Reports for non-receipt of PCB waste manifest from disposal facility

Exception Reports shall be submitted to EPA if the PCB disposal facility has not returned a copy of the manifest with the handwritten signature of the owner or operator of the facility within 45 days of the date the waste was accepted by the initial transporter. The Exception Report shall include the following:

- A legible copy of the manifest for which the generator does not have confirmation of delivery.
- A signed cover letter explaining the efforts taken to locate the PCB waste and the results of those efforts.

4.18.3.2 Exception Reports for non-receipt of Certificate of Disposal

Exception Reports shall be submitted to EPA if the PCB disposal facility fails to send a Certificate of Disposal confirming the disposal of the PCB waste within 13 months from the date that the **PCBs were removed from service**, or if the Certificate of Disposal is received more than 1 year after the date **PCBs were removed from service**. The Exception Report shall include the following:

- A legible copy of any manifest or other written communication relevant to the transfer and disposal of the affected PCBs.
- A signed cover letter explaining:
 - The date(s) when the material placed in each PCB Container was removed from service for disposal;
 - The date(s) when the PCB waste was received by the submitter of the report, if applicable;
 - The date(s) when the affected PCB waste was transferred to a designated disposal facility;
 - The identity of the transporters, commercial storers, or disposers known to be involved with the transaction;
 - The reason, if known, for the delay in bringing about the disposal of the affected PCB waste within 1 year from the date of the removal from service for disposal.

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4.18.4 PCB Annual Records

4.18.4.1 PCB Waste Manifests

Copies of PCB waste manifests that accompany waste shipments, as well as copies returned by the disposer, shall be maintained by Waste Regulatory Programs in files organized by calendar year. Copies of any manifest-related Exception Reports submitted to EPA shall be filed with the copy of the PCB Waste Manifest to which it applies. Written records of telephone or other confirmations concerning PCB waste manifests or shipments shall be filed with the PCB Waste Manifest to which it applies.

4.18.4.2 Certificates of Disposal

Certificates of Disposal shall be maintained by Waste Regulatory Programs in files organized by calendar year.

4.18.5 PCB Annual Document Log

Waste Regulatory Programs must prepare a written PCB Annual Document Log by each July 1 covering the previous calendar year (January through December).

TASK 2

The Log shall include:

- The name, address, EPA identification number of the facility, and the calendar year covered by the Log;
- The unique manifest number of every manifest generated by the facility during the calendar year, and from each manifest and for unmanifested waste that may be stored at the facility the following information:
 - For bulk PCB waste (in a tanker or truck) its weight in kilograms, the first date it was removed from service for disposal, the date it was placed into transport for offsite storage or disposal, and the date of disposal, if known;
 - The serial number (if available) or other means of identifying each PCB Article (e.g. transformer or capacitor), the weight in kilograms of the PCB waste in each Article, the date it was removed from service for disposal, the date it was placed in transport for off-site storage or disposal, and the date of disposal, if known.
 - A unique number identifying each PCB Container, a description of the contents of each PCB Container, such as liquid, soil, cleanup debris, etc., including the total weight of the material in kilograms in each PCB Container, the first date material placed in each PCB Container was removed from service for disposal,

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and the date each PCB Container was placed in transport for off-site storage or disposal, and the date of disposal (if known).

- A unique number identifying each PCB Article Container, a description of the contents of each PCB Article Container, such as pipes, capacitors, electric motors, pumps, etc. including the total weight of the material in kilograms in each PCB Article Container, the first date a PCB Article placed in each PCB Container was removed from service for disposal, and the date each PCB Article Container was placed in transport for off-site storage or disposal, and the date of disposal (if known).
- The total number by specific type of PCB Articles and the total weight in kilograms of PCBs in PCB Articles, the total number of PCB Article Containers and the total weight in kilograms of the contents of PCB Article Containers, the total number of PCB Containers and the total weight in kilograms of the contents of PCB Containers, and the total weight in kilograms of bulk PCB waste that was placed into storage for disposal or placed into storage for disposal or disposed during the calendar year.
- The total number of PCB Transformers and total weight in kilograms of PCBs contained in the transformers remaining in service at the end of the calendar year.
- The total number of Large High or Low Voltage PCB Capacitors remaining in service at the end of the calendar year.
- The total weight in kilograms of any PCBs and PCB Items in PCB Containers, including the identification of container contents, remaining in service at the facility at the end of the calendar year.
- For any PCBs or PCB Item received from or shipped to another facility owned or operated by the same generator, the information required above.
- A record of each telephone call, or other means of verification agreed upon by both parties, made to each designated commercial storer or designated disposal facility to confirm receipt of PCB waste transported by an independent transporter.

Responsible Organization(s)

Owners/operators of PCB-containing equipment, storage areas, or waste - Submit copies of all reports and records regarding PCBs to Waste Regulatory Programs.

Traffic Department - Submit copies of all PCB waste manifests to Waste Regulatory Programs. Coordinate Exception Reporting with Waste Regulatory Programs.

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Waste Regulatory Programs - Maintain centralized storage area for all PCB documentation. Prepare PCB Annual Document Log.

4.19 Personnel Training and Qualification

All RFP personnel and subcontractors who identify, control, maintain, analyze, package, segregate, inspect, transport, and dispose of PCBs shall receive related training. Training shall be in compliance with 1-10000-TUM, Training User's Manual (TUM). The following groups/Directorates shall be responsible for the coordination, development, implementation, maintenance, and evaluation of certain portions of the various training requirements:

4.19.1. Performance-Based Training:

- Conduct a Job Task Analysis for the TSCA Program **(TASK 14)**.
- Deliver and revise as needed the TSCA Training course **(TASK 15)**;
- Develop and revise, as necessary, a Qualification Standard Package (QSP) **(TASK 16)**;

4.19.2 Waste Regulatory Programs:

- Develop a Qualification program in conjunction with PBT for job classifications identified as requiring a Qualification program **(TASK 16)** that shall include;
 - 1) Participate in Job-Task analysis conducted by PBT;
 - 2) Assist PBT in the development and revisions of a Qualification Standard Package (QSP);
- Coordinate with Performance-Based Training to develop, revise and deliver classroom training and On-The-Job training;
- Maintain copies of historical records on training development related to a Qualification program;
- Develop a TSCA seminar in conjunction with PBT for supervisor training (need will be determined from Job-Task Analysis) **(TASK 17)**;
- Coordinate and assist line training organizations (such as Plant Services, Waste Operations, and Trucking training programs) in the review and revision of training related to PCB Items and PCB wastes.

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4.19.3 Operations and Functional Training Managers:

Training managers of job classifications requiring a Qualification program:

- Implement On-the-job training (OJT) and continued training;
- Implement Qualification Examination;
- Track training and qualification records for PCB personnel.

On-the-job training managers:

- Assist in the development and/or modification of OJT and continued training in support of the PCB program;
- Implement OJT training related to PCB programs;
- Control and maintain copies of training records for PCB personnel.

4.19.1.5 Plant Training Records:

- Centralized control and maintenance of all training and qualification documents and records.

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5.0 REFERENCES

1-10000-ADM	Quality Assurance Manual
DOE 5480.20	Personnel Selection, Qualification, and Training Requirements (3/23/89)
DOE 5700.6C	Quality Assurance Program Requirements
1-10000-EWQA	Waste Management Quality Assurance Program Plan
1-10000-TRM	TSCA Requirements Manual
EPA-SW-846	Test Methods for Evaluating Solid Waste,Physical/Chemical Methods
1-10000-TUM	RFP Training Users Manual
WP-1027	Non-Radioactive Waste Packaging
WO-1100	Solid Radioactive Waste Packaging Inside the PA
WO-1101	Solid Radioactive Waste Packaging Outside the PA
WO-1102	Waste Residue Traveler Instructions
	Spill Response and Reporting Manual
	On-Site Transportation Manual
	Transportation Manual

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6.0 CODES, STANDARDS, AND REGULATIONS

DOE 1324.2	Records Disposition
DOE 1540.2	Hazardous Material Packaging - Administrative Procedures
DOE 5400.1	General Environmental Protection Program
DOE 5440.1C	National Environmental Policy Act
DOE 5440.1D	National Environmental Policy Act Compliance Program
DOE 5480.3	Safety Requirements for the Packaging and Transportation of Hazardous Materials, Hazardous Substances, and Hazardous Wastes
DOE 5480.4	Environmental Protection Safety & Health Standards
6 CCR 1007-3	Colorado Hazardous Waste Regulations
40 CFR 61	National Emission Standards for Hazardous Air Pollutants
40 CFR 280, 302	Protection of Environment
40 CFR 702 - 799	Protection of Environment
49 CFR 171 - 180	Transportation of Hazardous Waste
22 Calif. Code of Reg. Chapter 3, Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65), adopted 7/11/89	

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7.0 ATTACHMENTS

- Attachment 1 EPA-Approved PCB Label
- Attachment 2 PCB Temporary Storage Authorization
- Attachment 3 TSCA Storage Area Form
- Attachment 4 PCB Storage Area Inspection Checklist Page 1
- Attachment 5 PCB Storage Area Inspection Checklist Page 2
- Attachment 6 PCB Internal Overpack Inspection Log
- Attachment 7 PCB Spill Cleanup Report
- Attachment 8 Reserved for future use.

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Attachment 1
EPA-Approved PCB Label

**CAUTION
CONTAINS**

PCBs

(Polychlorinated Biphenyls)

A toxic environmental contaminant requiring special handling and disposal in accordance with U.S. Environmental Protection Agency Regulations 40 CFR 761-For Disposal Information contact the nearest U.S. E.P.A. Office.

In case of accident or spill, call toll free the U.S. Coast Guard National Response Center:

800-424-8802

Also contact: _____

Tel. No. _____

Lab Safety Supply, Inc.

Reorder No. G98

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Attachment 2
PCB Temporary Storage Authorization

PCB TEMPORARY STORAGE AUTHORIZATION
30 DAY MAXIMUM

Start*

Date: _____

Expiration

Date: _____

Originator: _____

Group: _____

Item Description: _____

Temporary Storage Location: _____

Reason for Temporary Storage: _____

SAMPLE

Approvals:

Building Manager

Waste Regulatory Programs Group

Hazardous Waste Operations Mgr

*The start date is the date the waste was generated and placed in the waste container.

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Attachment 3
TSCA Storage Area Form

TSCA STORAGE AREA FORM

Requested Change of Information

DATE: _____

NAME: _____

please print

TSCA Storage Area (Bldg. /Room) _____

Check the appropriate box::

☐ Request for new storage area - complete all blanks for storage area custodian and alternate

☐ Change of information - complete blanks as appropriate for all changes

Storage Area Custodian:

Name: _____

Organization: _____

Building: _____

Ext./Pager: _____

Supervisor: _____

Storage Area Alternate:

Name: _____

Organization: _____

Building: _____

Ext./Pager: _____

Supervisor: _____

Approval : _____
Waste Regulatory Programs

Date

(WRP signature not required for custodian changes)

Send completed form to TSCA Program Manager, Waste Regulatory Programs, Building T130C

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Attachment 4

PCB Storage Area Inspection Checklist Page 1

PCB STORAGE AREA INSPECTION CHECKLIST (Page 1)

INSPECTED BY _____ DATE _____			
BUILDING NO. _____ ROOM NO. _____		AREA ID# _____	
AREA CUSTODIAN _____		PHONE _____	
OPERATIONS MANAGER _____		PHONE _____	
Date of next inspection _____ (Inspections must be performed every 30 days)			
MARK THE APPROPRIATE BOX YES OR NO NO ANSWERS REQUIRE COMMENT	YES	NO	COMMENTS - Use Page 2 to document corrective actions and completion dates
1. Was last inspection performed 30 days ago or less?			
2. Are all containers properly marked?			
3. Are all entrances to the storage area properly marked?			
4. Does the area have a continuous curb, six inches in height, or are containers being stored within an overpack unit?			
5.a. Does the curb or containment area have a volume of at least two times the internal volume of the largest PCB Article or PCB Container or 25% of the total volume of all PCB Articles or PCB Containers stored therein, whichever is greater? (If applicable)			
5.b. Has overpack container been opened and inspected for leaks during this quarter (i.e. Jan-Mar, Apr-Jun, Jul-Sep, Oct- Dec)? Ref the PCB Internal Overpack Inspection Log.			
6. Is the floor free from any openings, such as drain valves, floor drains, expansion joints, lines, etc.?			
7. Is the floor surface continuously smooth and impervious?			
8. Are roofs and walls of the storage area adequate to prevent rain water from reaching the stored PCBs and PCB Items.			
9. Is drum and/or overpack container condition acceptable (i.e. bulges, rust, dents, or other evidence of damage)?			
10. Are all PCB Articles and PCB containers free of leaks?			
11. Are storage dates on all containers?			
12. Are hazardous waste labels being used consistently with the contents?			

Return one copy to Waste Regulatory Programs within 10 calendar days.

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Attachment 5

PCB Storage Area Inspection Checklist Page 2

PCB STORAGE AREA
INSPECTION CHECKLIST
(continued)

Inspected By _____ Building _____ Room _____
Date _____ Area ID# _____
Oper. Manager _____ Extention _____
Custodian _____ Extention _____

Describe the Condition

Corrective Action & Completion Date

SAMPLE

Return one copy of the PCB Storage Area Inspection Checklist to the Waste Guidance Group, and report the status of Corrective Actions monthly until completed.

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Attachment 7
PCB Spill Cleanup Report

PCB SPILL CLEANUP REPORT

Page 1 of _____

Organization _____

Date of report (today's date) _____

Date and time of spill _____

Source of spill _____

Date and time spill cleanup was completed _____

Specific spill location (inside an identified building or area) _____

Methodology used to define spill boundaries (sampling [include type], monitoring [include type], visual, etc.) _____

Description of surfaces cleaned _____

Wash/rinse method used _____

Approximate depth of soil excavated and amount removed (if applicable) _____

Estimated cost of cleanup _____

Post-cleanup decontamination test results. (This includes post cleanup verification of sampling data and methodology, and a description of analytical techniques used. If data is attached, please paginate with this report.)

Certification Statement

The cleanup requirements specified have been met, and the information supplied in this record is true to the best of my knowledge.

Signed: _____

Date: _____

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Attachment 8

Reserved for future use.

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APPENDIX A

TSCA PROGRAM STATUS

- 1.0 PROGRAM STATUS: The TSCA program at the Rocky Flats Plant has received an increased amount of awareness and attention during the past year. The problems which have been identified emphasize the need for a comprehensive TSCA Management Program which fully outlines organizational responsibilities and the necessary actions needed to bring the TSCA program into full compliance with the regulations. The following paragraphs outline some of the problems identified during the past year. The necessary corrective actions, responsible organizations, and completion dates are listed in the Implementation Tasks section. The implementation tasks will be reviewed on a regular basis and updated as required.
- 2.0 PROBLEMS AND ISSUES
 - 2.1 Data/Records

An accurate or complete listing does not currently exist which documents equipment that has PCBs or is PCB contaminated. An inventory will be conducted to identify all known or potential PCB or PCB-contaminated items. For equipment which does not have defensible data on PCB content, the fluid will be sampled and analyzed. The data and records will be gathered and maintained by the TSCA Program Administrator; a computer data base will also be developed.
 - 2.2 Analytical Testing

The Rocky Flats Plant does not currently have approval for the on-site analysis of PCBs. The capability for analysis of non-radioactive PCBs is being developed in Building 881; the equipment is in place and SO testing is about to commence. Laboratory procedures will be developed for the analyses. Building 559 will develop a similar setup for the on-site analysis of radioactive PCBs.
 - 2.3 Storage of Radioactive PCB Waste

The Rocky Flats Plant is currently storing radioactive PCB waste beyond the one year time limit since no disposal facilities exist which are approved for the disposal of this radioactive waste. EG&G Rocky Flats and DOE/Rocky Flats are currently investigating the options for disposal of this waste.
 - 2.4 TSCA Waste Packaging and Storage Areas

Some of the problems which have occurred in this area include improper drum color, missing PCB labels on drums or areas, and missed inspections. These types of problems can be attributed to lack of attention, training or inadequate procedures.

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2.5 Awareness

Plant awareness of TSCA issue has been a problem in the past, however as discussed above, overall TSCA awareness has increased during the past year due to the emphasis on environmental compliance. Awareness levels of TSCA issues will continue to be increased through the use of Envirograms, enhanced training programs, establishment/revision of floor-level procedures.

2.6 Training

A TSCA training class was established in August 1992. This program will be revised as necessary to reflect any changes in the TSCA program. In addition, a supervisor seminar and a Qualification Card for TSCA will be developed and implemented to enhance the established classroom training.

2.7 Procedures

The need for additional or more detailed floor-level procedures has been identified. Since the TSCA Management Plan addresses the TSCA regulatory requirements, the TSCA Requirements Manual will be eliminated after all required floor-level procedures have been completed. (The TSCA Requirements Manual is currently a combination of requirements and procedures.) In the meantime, some overlap of information will exist between the documents.

2.8 Ownership/Responsibility

In the past, responsibilities of individual organizations regarding actions required by the TSCA regulations have not been fully defined and documented. The TSCA Management Plan rectifies this problem by outlining the requirements of the TSCA regulations and each organizations' responsibilities.

3.0 IMPLEMENTATION PLAN

TASK 1- Develop a plan to sample and analyze all items that do not have defensible data or information on PCB levels.

Responsible Organization: Waste Regulatory Programs

Completion Date: March 31, 1993

TASK 2- Complete and submit to EPA the PCB Annual Document Log.

Responsible Organization: Waste Regulatory Programs

Completion Date: July 1, 1993

TASK 3- Consolidate and centralize all existing PCB records.

Responsible Organization: Waste Regulatory Programs

Completion Date: March 1, 1993

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- TASK 4- Inventory all areas and compile a list of items that do not have defensible data or information.
 Responsible Organization: Operations Managers
 Completion Date: March 1, 1993
- TASK 5- Develop a PCB database using information collected from the Operations Managers.
 Responsible Organization: Waste Regulatory Programs
 Completion Date: March 31, 1993
- TASK 6- Publish an Envirogram on PCB Light Ballasts to identify methods for identification, radiological determination, and handling of PCB ballasts.
 Responsible Organization: Waste Regulatory Programs
 Completion Date: 2/15/93
- TASK 7- Develop laboratory procedures for sampling and analyzing PCBs and PCB contaminated items.
 Responsible Organization: Analytical Labs
 Completion Date: March 1, 1993 (waste oil samples)
 August 1, 1993 (water samples)
- TASK 8- Ensure that all aspects of asbestos waste management are addressed in existing waste procedures. Revise procedures as necessary. Delete asbestos section from the TSCA Requirements Manual.
 Responsible Organization: Waste Regulatory Programs
 Completion Date: April 1, 1993
- TASK 9- Ensure that all aspects of PCB waste management are addressed in existing waste procedures. Revise or develop procedures as necessary. Eliminate the TSCA Requirements Manual.
 Responsible Organization: Waste Regulatory Programs
 Completion Date: April 1, 1993
- TASK 10 - Develop floor-level procedures on how to inspect, at required frequencies, suspected and identified TSCA regulated materials. The procedures shall provide for the maintenance of the records documenting these inspections and any corrective actions taken.
 Responsible Organization: Operations Managers
 Completion Date: August 1, 1993
- TASK 11- Develop PCB spill response and cleanup procedure.
 Responsible Organization: Waste Regulatory Programs
 Completion Date: April 1, 1993

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TASK 12- Develop a procedure for the handling and packaging of radioactive PCB waste.

Responsible Organization: Waste Regulatory Programs

Completion Date: July 15, 1993

TASK 13- Review training records to ensure plant personnel have attended or are scheduled to attend the TSCA training class.

Responsible Organization: Building Qualification Managers

Completion Date: March 15, 1993

TASK 14 - Perform a Job Task Analysis of the TSCA program.

Responsible Organization: Performance Based Training

Completion Date: April 15, 1993

TASK 15- Update the TSCA training class as appropriate.

Responsible Organization: Performance Based Training

Completion Date: June 1, 1993

TASK 16- Develop a Qualification Standard Package for the TSCA Program

Responsible Organization: Performance Based Training and Waste
Regulatory Programs

Completion Date: August 15, 1993

TASK 17- Develop a TSCA seminar in conjunction with PBT for supervisors (need will be determined from the Job Task Analysis).

Responsible Organization: Waste Regulatory Programs

Completion Date: August 15, 1993

TASK 18- Review 40 CFR 700-799 to evaluate the applicability of chemical manufacturing regulations under TSCA.

Responsible Organization: Waste Regulatory Programs

Completion Date: September 31, 1993

TASK 19- Evaluate the possibility of setting up a contract for emergency spill cleanup and analysis of spill material.

Responsible Organization: Waste Regulatory Programs

Completion Date: March 15, 1993

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APPENDIX B

QUALITY ASSURANCE MATRIX

IMPLEMENTATION MATRIX OF QUALITY ASSURANCE REQUIREMENTS

REQUIREMENT	IMPLEMENTING DOCUMENT			REMARKS
QUALITY REQUIREMENT	DOCUMENT NUMBER	TITLE		
QR-1. ORGANIZATION	2-20000-ADM 1.01	Environmental and Waste Management Organization	Organizational functions and responsibilities regarding TSCA management are identified throughout plan.	
	1-10000-EWQA Section 1.5	TSCA Management Plan		
	1-10000-EWQA Section 1.3	Waste Characterization Quality Requirements		
	1-10000-ADM	Rocky Flats Organization Manual Quality Assurance Manual		
QR-2. QUALITY ASSURANCE PROGRAM	1-10000-EWQA Section 1.5	TSCA Management Plan	Quality Assurance elements have been incorporated throughout TSCA Management Plan. Note: QRs listed below have corresponding sections from the Plan identified in the Remarks column of this Matrix.	
	1-10000-EWQA Section 1.3	Waste Characterization Quality Requirements		
	1-10000-ADM	Quality Assurance Manual		

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IMPLEMENTATION MATRIX OF QUALITY ASSURANCE REQUIREMENTS

REQUIREMENT	IMPLEMENTING DOCUMENT			
QUALITY REQUIREMENT	DOCUMENT NUMBER	TITLE	REMARKS	
QR-2. QUALITY ASSURANCE PROGRAM (Continued)	2-20000-ADM	Development and Control of Qualification Standards and Qualification Cards		
		Training Users Manual		
		Metrology Labs Quality Assurance Manual		
	COEM	Conduct of Engineering Manual		
		Analytical Labs Quality Assurance Program		
QR-3. DESIGN CONTROL	SX Series	Certificate of Compliance		See Sections: 4.2 4.13
		Rocky Flats Plant Standards Manual		
		Facilities Engineering and Project Management Manual		
	1-10000-HWR	Hazardous Waste Requirements Manual		
	1-10000-TRM	TSCA Requirements Manual		
	COEM	Conduct of Engineering Manual		

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REQUIREMENT		IMPLEMENTING DOCUMENT	
QUALITY REQUIREMENT	DOCUMENT NUMBER	TITLE	REMARKS
QR-3. DESIGN CONTROL (continued)	CCCP	Configuration Change Control Procedures	See Section 4.4
	DCT-5	Design Change Control	
	DES-3-6, & 16	FE & Program Management Procedures	
	DCT- 1 to 4	FE & Program Management Procedures	
QR-4. PROCUREMENT DOCUMENT CONTROL	6000 Series	PQE Procedures	
	QID's	Quality Instruction Directives	
		Procurement System Policy Manual	
	SX Series	Rocky Flats Plant Standards Manual	
	COEM	Conduct of Engineering Manual (Section 6.3.6 and 6.5.14)	
	CCCP	Configuration Change Control Program Manual	

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QUALITY REQUIREMENT	DOCUMENT NUMBER	TITLE	REMARKS
QR-5. INSTRUCTIONS, PROCEDURES, AND DRAWINGS	1-10000-EWQA Section 1.0	Waste Management Quality Assurance Program Plan	See Sections: 4.3.1 4.7 4.8 4.12 4.16 4.18 4.19 Task 6 Task 7 Task 9 Task 10 Task 11 Task 12 Task 15 Task 17
	1-10000-EWQA Section 1.5	TSCA Management Plan	
	1-10000-ADM	Quality Assurance Manual	
	2-20000-ADM	Development and Control of Qualification Standards and Qualifications Cards	
	1-10000-HWR	Hazardous Waste Requirements Manual	
	1-10000-TRM	TSCA Requirements Manual	
	1-11000-PAPG-001	Technical Procedures Preparation Process	
	1-11000-PAPG-002	Administrative Procedures Preparation Process	
	1-11000-PAPG-003	Procedure Writing Guide for Technical and Administrative Procedures	
	1-11000-PAPC-004	Procedures Document Control Process	
	WC-4001	Waste Certification QE Process	
		Quality Instruction Directives	

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REQUIREMENT	IMPLEMENTING DOCUMENT		
QUALITY REQUIREMENT	DOCUMENT NUMBER	TITLE	REMARKS
QR-5. INSTRUCTIONS, PROCEDURES, AND DRAWINGS (continued)		WSRIC Books and WIS	
		Metrology Lab Manual	
		Assurance Audit Procedure Manual	
		Waste Certification Procedures:	
	WQE-4001	Certification of Packages for Off-Site Shipment	
	WC-4002	Transuranic and Low Level Waste Acceptance Criteria for the Real Time Radiography Facility	
	WC-4003	Solid Waste Inspection	
	WC-4004	Waste IDC Manual	
	WI-4010	Issue Inspection	
	WI-4011	In Process Inspection	
	WI-4012	Dock Inspection	
	WI-4013	Final Inspection and Loading	

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REQUIREMENT	IMPLEMENTING DOCUMENT		
QUALITY REQUIREMENT	DOCUMENT NUMBER	TITLE	REMARKS
QR-5. INSTRUCTIONS, PROCEDURES, AND DRAWINGS (continued)		Waste Certification Procedures - cont.	
	WC-4014	Nonconformance Procedure	
	WC-4127	Certification Procedure	
		Waste Surveillance Program Proc.:	
	NWQAP-1002	Surveillance Activities	
		Waste Operations Procedures:	
	E&WM 5.01 & 5.02	ER&WM Procedure Control System	
	WO-1102	Waste/Residue Traveler Instructions	
	WO-1200	WEMS Standard Operating Procedures	
	WO-5006	Shipping Waste From Building 664	
	WO-4031	Packaging and Handling Classified Wastes	
	WO-4040	Waste Operations Supplies	
	WO-5035	Handling Solid Waste Building 664	

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REQUIREMENT	IMPLEMENTING DOCUMENT			REMARKS
QUALITY REQUIREMENT	DOCUMENT NUMBER	TITLE		
QR-5. INSTRUCTIONS, PROCEDURES, AND DRAWINGS (continued)		Waste Operations Procedures - cont.		
	WO-5238	Four-Tier Drum Stacking		
	WO-5277	Drum Handling and Storage		
	WP-1027	Non-Radioactive Waste Packaging		
		Traffic Procedures:		
		The On-Site Transportation Manual		
		The Transportation Manual		
		Traffic Desk Procedures		
	T-200-4	Procedure for the use of Waste Operation's shipment preparation certification form (RF-46414)		
	T-1000	Traffic Procedure Control		

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QUALITY REQUIREMENT	DOCUMENT NUMBER	TITLE	REMARKS	
QR-5. INSTRUCTIONS, PROCEDURES, AND DRAWINGS (continued)		Purchasing Procedures:		
		Procurement Systems Requirements Manual		
		Procurement Department Procedures		
		Procurement Quality Engineering Instructions:		
	1-10000-ADM	Quality Assurance Manual		
	QP-4A	Procurement Quality Procedure		
	QP-4B	Supplier Evaluation System		
	PQE-6100	Procurement Document Reviews		
	PQE-6210	Supplier Evaluation Selection		
	PQE-6220	Supplier Annual Evaluation		
	PQE-6240	Supplier Survey Procedure		
	PQE-6500	Product Receipt and Acceptance		

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QUALITY REQUIREMENT	DOCUMENT NUMBER	TITLE	REMARKS
QR-5. INSTRUCTIONS, PROCEDURES, AND DRAWINGS (continued)		Facility Engineering and Program Management Procedures:	
	DES-3	Design Review and Approval	
	DES-4	Design Codes and Standards	
	DES-5	Specification for Procurement and Construction	
	DES-6	Control of Facilities Engineering Drawings	
	DES-16	Rocky Flats Plant Standards	
	DES-18	Facilities Quality Acceptance Documentation	
	FAC-13	Project Record Management	
	FAC-24	Nonconformance Control (FE projects)	
	FAC-29	Systems Operational Testing and Acceptance Procedure	
	DCT-1	Design Inputs	
	DCT-2	Design Process	

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REQUIREMENT	IMPLEMENTING DOCUMENT		
QUALITY REQUIREMENT	DOCUMENT NUMBER	TITLE	REMARKS
QR-5. INSTRUCTIONS, PROCEDURES, AND DRAWINGS (continued)		Facility Engineering and Program Management Procedures - cont.	
	DCT-3	Design Calculations	
	DCT-4	Design Verification	
	DCT-5	Design Change Control	
		NonDestructive Testing Procedures:	
	QT-1009	Real-Time Radiography for TRU and LLW	
	SX-122	Pressure Sensitive Adhesive Vinyl Plastic Tape	
	SX-123	Polyethylene Drum and Waste Container Liners	
	SX-0200	DOT-17C, 55 Gallon Drum	
	SX-0202	Molded Rigid Drum Liner	
	SX-0203	Plastic Drum Liner (Round Bottom)	
	SX-0205	Gasket for 55 Gallon Drum	

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REQUIREMENT		IMPLEMENTING DOCUMENT	
QUALITY REQUIREMENT	DOCUMENT NUMBER	TITLE	REMARKS
QR-5. INSTRUCTIONS, PROCEDURES, AND DRAWINGS (continued)		NonDestructive Testing Procedures - cont.	
	SX-0208	Fiberboard Liner for Metal and Flush Box	
	SX-0209	PVC Liner for Flush Panel Box	
	SX-0211	Flush Panel Plywood Box Assembly	
	SX-0234	Closure Ring Assembly for Type III Rigid Poly Drum Liner	
	SX-0237	PVC Bag with O-Ring for Metal Waste Box	
	SX-0239	Standard for 55 Gallon 110 Mil. Straight Wall Liner	
	SX-0240	Standard for DOT-17C 35 Gallon Drum	
	SG-0329	PVC Glovebox Bags with O-Ring	

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REQUIREMENT		IMPLEMENTING DOCUMENT	
QUALITY REQUIREMENT	DOCUMENT NUMBER	TITLE	REMARKS
QR-6. DOCUMENT CONTROL	WI-4011	In Process Inspection	See Sections: 4.18 Task 3
	WI-4012	Dock Inspection	
	PQE 6000	PQE Procedures	
		Procurement System Policy Manual	
		Classified Document Control Handbook	
		Records Management Manual	
	TUM-01.01	Document Training Program	
	E&WM 5.01/5.02	E&WM Procedure Control System	
	T-1000	Traffic Procedure Control	
	FAC-13	Project Record Management	
	COEM	Conduct of Engineering Manual	
	3-23000-ADM (WP2300)	WSRIC Document Control Procedure	
	DCT-5	Design Change Control	

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REQUIREMENT	IMPLEMENTING DOCUMENT		
QUALITY REQUIREMENT	DOCUMENT NUMBER	TITLE	REMARKS
QR-7. CONTROL OF PURCHASED ITEMS AND SERVICES	PQE 6000	PQE Procedures	See Section 4.4
		Quality Instruction Directives	
		Procurement System Policy Manual	
	1-50000-ADM-04.01	Quality Assurance Manual	
QR-8. IDENTIFICATION AND CONTROL OF ITEMS	RF-1570	Purchasing Requisition Form	See Sections: 4.1 4.2 4.3 4.5 4.12 4.13 4.14 4.16 Task 1 Task 4 Task 5 Task 7
	RF-47386	Waste Residue Traveler	
	WC-4004	Waste IDC Manual	
	WO-1201	WEMS Container Inventory Tracking Control	
		Uniform Hazardous Waste Manifest	
		WSRIC Book and WIS	
	WP-1027	Non-Radioactive Waste Packaging	

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QUALITY REQUIREMENT	DOCUMENT NUMBER	TITLE	REMARKS
QR-9. CONTROL OF PROCESSES	1-10000-EWQA Section 1.5	TSCA Management Plan (Process Control Plans)	See Sections: 4.1 4.2 4.3 4.6 4.12 4.13 Tasks 1 through 17
	1-10000-HWR	Hazardous Waste Requirements Manual	
	1-10000-TRM	TSCA Requirements Manual	
	RF-47386	Waste/Residue Traveler	
	WI-4011	In Process Inspection	
	WI-4012	Dock Inspection	
	WO-1102	Waste/Residue Traveler Instructions	
	WP-1027	Non-Radioactive Waste Packaging	
	RFQ-TC-1A	WSRIC Books and WIS Qualification and Certification of NDT Personnel for RTR	

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QUALITY REQUIREMENT	DOCUMENT NUMBER	TITLE	REMARKS
QR-10. INSPECTION	1-10000-TRM	TSCA Requirements Manual	See Sections: 4.3 4.12 4.17 Task 10
		Quality Instruction Directives	
		Nonconformance Report	
	RF-47386	Waste/Residue Traveler	
	WO-1102	Waste/Residue Traveler Instructions	
	WI-4011	In Process Inspection	
	WI-4012	Dock Inspection	
	WC-4004	Waste IDC Manual	
	WI-4010	Issue Inspection	
	WI-4013	Final Inspection and Loading	

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REQUIREMENT	IMPLEMENTING DOCUMENT		
QUALITY REQUIREMENT	DOCUMENT NUMBER	TITLE	REMARKS
QR-11. TEST CONTROL	SX Series	Rocky Flats Plant Standards Manual	See Sections: 4.2.6 4.8 4.12 Task 1 Task 7
		Quality Instruction Directives	
		Metrology Labs Manual	
	QT-1009	Real Time Radiography Testing of TRU and LLW Waste	
	WEMS-CP100	WEMS SQA Compliance Procedure	
	1-10000-EWQA Section 1.5	TSCA Management Plan (Process Control Plans)	

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REQUIREMENT	IMPLEMENTING DOCUMENT		
QUALITY REQUIREMENT	DOCUMENT NUMBER	TITLE	REMARKS
QR-12. CONTROL OF TEST AND MEASURING EQUIPMENT			See Sections: 4.12 Task 1 Task 7
	SX Series	Rocky Flats Plant Standards Manual	
		Quality Instruction Directives	
	QT-1009	Real-Time Radiography for TRU & LLW	
	WC-4002	TRU & LLW Acceptance Criteria for the RTR Facility	
	S-A-00008	Recall Procedure	
		Metrology Labs Manual	
		RFP Standards Lab Calibration Data Sheet	
		RF Calibration Records Form	
		Equipment Deviation Forms	
	SOP-12	Control of Test and Measuring Equipment	

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REQUIREMENT	IMPLEMENTING DOCUMENT		
QUALITY REQUIREMENT	DOCUMENT NUMBER	TITLE	REMARKS
QR-13. HANDLING, STORAGE, AND SHIPPING	1-10000-EWQA Section 1.5	TSCA Management Plan	See Sections: 4.2 4.6 4.10 4.12 4.14 4.16 Task 6 Task 9 Task 10 Task 11 Task 12
		Transportation Manual	
	1-10000-HWR	Hazardous Waste Requirements Manual	
	1-10000-TRM	TSCA Requirements Manual	
	T-200-4	Procedure for the Use of Waste Operation's Shipment Preparation Certification Form	
		On-Site Transportation Manual	
	WI-4011	In Process Inspection	
	WI-4012	Dock Inspection	
	WC-4002	TRU & LLW Acceptance Criteria for the RTR Facility	
	WO-1001.2	Coordinators Receiving Waste Drums in Building 664	
	WO-1001.4	Coordinators Receiving Waste Boxes in Building 664	
	WP-1202	WEMS Certification for Off-Site Shipment	

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REQUIREMENT	IMPLEMENTING DOCUMENT		
QUALITY REQUIREMENT	DOCUMENT NUMBER	TITLE	REMARKS
QR-13. HANDLING, STORAGE, AND SHIPPING (continued)	WO-4031	Packaging and Handling Certified Wastes	
	WO-5001	Shipping/Receiving Building 664	
	WO-5001.1	Shipping Empty Containers and Check-Off List	
	WO-5001.2	Receiving Waste Drums and Check-Off List	
	WO-5006	Shipping Waste From Building 664	
	WO-5035	Handling Solid Waste Building 664	
	WO-5238	Four-Tier Drum Stacking	

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REQUIREMENT	IMPLEMENTING DOCUMENT		
QUALITY REQUIREMENT	DOCUMENT NUMBER	TITLE	REMARKS
QR-14. INSPECTION, TEST AND OPERATING STATUS	1-10000-TRM	TSCA Requirements Manual	See Sections: 4.1 4.2 4.3 4.6 4.12 Task 16
	1-10000-WCP 1	Integrated Work Control Procedure Manual	
	SX Series	Rocky Flats Plant Standards Manual	
		Quality Instruction Directives	
	HSP 2.08	LOTO - Health and Safety Practices	
	1-50000-ADM-15.01	Control of Nonconforming Items	
	T-200-4	Procedure for the use of Waste Operation's Shipment Preparation Certification Form	
		Nonconformance Report	
	RFQ-TC-1A	Qualification and Certification of NDT Personnel for RTR	
	QT-1009	Real-Time Radiography for TRU & LLW	
	RF-47386	Waste Residue Traveler	

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REQUIREMENT		IMPLEMENTING DOCUMENT	
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QR-14. INSPECTION, TEST AND OPERATING STATUS (continued)	WQE-4001	Certification of Packages for Off-Site Shipment	
	SC-4003	Solid Waste Inspection	
	WI-4010	Issue Inspection	
	WI-4011	In Process Inspection	
	WI-4012	Dock Inspection	
	WI-4013	Final Inspection and Loading	
	WC-4014	Waste Nonconformance	
	FAC-29	Systems Operations Testing and Acceptance Procedure	
	1-50000-ADM-15.02	Stop Work Action	

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REQUIREMENT	IMPLEMENTING DOCUMENT		
QUALITY REQUIREMENT	DOCUMENT NUMBER	TITLE	REMARKS
QR-15. CONTROL OF NONCONFORMING ITEMS	1-50000-ADM-15.01	Control of Nonconforming Items	See Section 4.17
	WC-4014	Nonconformance Report	
	FAC-24	Waste Nonconformance	
		Nonconformance Control (FE Projects)	
QR-16. CORRECTIVE ACTION	WC-4014	Assurance Audit Procedure Manual	See Section 4.17
	1-50000-ADM-16.16	Waste Rejection Reporting	
		Corrective Action Program	
	1-50000-ADM-15.02	Stop Work Action	

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REQUIREMENT		IMPLEMENTING DOCUMENT	
QUALITY REQUIREMENT	DOCUMENT NUMBER	TITLE	REMARKS
QR-17. QUALITY ASSURANCE RECORDS	1-10000-EWQA Section 1.5	TSCA Management Plan	See Sections: 4.18 Task 2 Task 3
	1-10000-TRM	TSCA Requirements Manual	
	SX Series	Rocky Flats Plant Standards Manual	
		Quality Instruction Directives	
		Waste/Residue Traveler	
		RFP Records Management Manual	
		Nonconformance Report	
		Request for Calibration Form	
		Calibration Data Sheet	
		Equipment Deviation Forms	
	DES-18	Facilities Quality Acceptance Documentation	
	FAC-13	Project Record Management	

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Quality Assurance Matrix (continued)

IMPLEMENTATION MATRIX OF QUALITY ASSURANCE REQUIREMENTS

REQUIREMENT	IMPLEMENTING DOCUMENT		
QUALITY REQUIREMENT	DOCUMENT NUMBER	TITLE	REMARKS
QR-18. AUDITS	1-10000-EWQA Section 1.5	TSCA Management Plan	See Section 4.17
	1-50000-ADM- 18.01	Assurance Audit Procedure Manual	
		Quality Assurance Manual	
QR-19. SOFTWARE QUALITY ASSURANCE	1-50000-ADM	Quality Assurance Manual	See Task 5
	1-10000-EWQA Section 1.5	TSCA Management Plan	
	WEMS-CP100	WEMS Software Quality Assurance Compliance Procedure	
	WP-1200	WEMS System Requirements	
	WP-1201	WEMS Container Inventory Tracking Control	
	WP-1202	WEMS Certification for Off-Site Shipment	

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IMPLEMENTATION MATRIX OF QUALITY ASSURANCE REQUIREMENTS

REQUIREMENT		IMPLEMENTING DOCUMENT	
QUALITY REQUIREMENT	DOCUMENT NUMBER	TITLE	REMARKS
QR-20. QUALITY IMPROVEMENT	1-10000-ADM QAP-21.01	Assurance Audit Procedure Manual	See Section 4.17
QR-21. SURVEILLANCE		Quality Assurance Manual	See Section 4.17
QR-22. COST OF QUALITY		Surveillance Program	

APPENDIX C
REQUIREMENTS MATRIX

40 CFR Ref

Regulatory Requirement

Subject

Section

Prohibitions (1)	No persons may use any PCB, or any PCB item regardless of concentration, in any manner other than in a totally enclosed manner within the United States unless authorized under the regulations, except that: An authorization is not required to use those PCBs or PCB items which consist of excluded PCB products as defined in the regulations, or to use those PCB items which contain or whose surfaces have been in contact with excluded PCB products as defined in the regulations.	761.20(a)	4.2.1
Use in and Servicing of Transformers (1)	PCBs at any concentration may be used in transformers for the remainder of their useful lives, subject to the conditions of the regulations.	761.30(a)	4.2.1
(2)	Use Conditions: The use and storage for reuse of PCB Transformers that pose an exposure risk to food or feed is prohibited.	761.30(a)(1)(i)	4.2.1
(3)	Installation of a retrofilled mineral oil PCB Transformer for reclassification purposes is permitted indefinitely. The transformer must be tested in accordance with the regulations 3 months after installation to ascertain the concentration of PCBs.	761.30(a)(1)(iii) (C)(2)(ii)	4.2.1
(4)	All PCB Transformers must be registered with fire response personnel with primary jurisdiction.	761.30(a)(1)(vi)	4.7.1
(5)	Combustible materials, including, but not limited to paints, solvents, plastics, paper, and sawn wood must not be stored within a PCB Transformer enclosure; within 5 meters of a transformer enclosure, or, if unenclosed (unpartitioned), within 5 meters of a PCB Transformer.	761.30(a)(1)(viii)	4.2.1
(6)	A visual inspection of each PCB Transformer in use or stored for reuse shall be performed at least once every 3 months.	761.30(a)(1)(ix)	4.3.2
(7)	If a PCB Transformer is found to have a leak which results in any quantity of PCBs running off or about to run off the external surface of the transformer, then the transformer must be repaired or replaced to eliminate the source of the leak. In all cases any leaking material must be cleaned up and properly disposed of according to disposal requirements. Cleanup must be initiated as soon as possible but in no case later than 48 hours of its discovery.	761.30(a)(1)(x)	4.3.2
(8)	If a PCB Transformer is involved in a fire-related incident, the owner of the transformer must immediately report the incident to the National Response Center.	761.30(a)(1)(xi)	4.7.1.1

Subject	Regulatory Requirement	40 CFR Ref	Section
(9)	Records of inspections and maintenance history shall be maintained at least 3 years after disposing of the transformer and shall be made available for inspection, upon request by EPA.	761.30(a)(1)(xii)	4.18
(10)	A reduced visual inspection frequency of at least once every 12 months applies to PCB Transformer that utilize specific risk reduction measures. These inspections may take place any time during the calendar year as long as there is a minimum of 180 days between inspections.	761.30(a)(1)(xiii)	4.3.2
(11)	An increased visual inspection frequency of at least once every week applies to any PCB Transformer in use or stored for reuse which poses an exposure risk to food or feed.	761.30(a)(1)(xiv)	4.3.2
(12)	In the event a mineral oil transformer, assumed to contain less than 500 ppm of PCBs, is tested and found to be contaminated at 500 ppm or greater PCBs, it will be subject to all the requirements of Part 761. In addition, efforts must be initiated immediately to bring the transformer into compliance.	761.30(a)(1)(xv)	4.2.1
(13)	<i>Servicing Conditions in Transformers.</i> Any servicing of PCB Transformers that requires the removal of the transformer coil from the transformer casing is prohibited.	761.30(a)(2)(ii)	4.6.3
(14)	PCBs removed during any servicing activity must be captured and either reused as dielectric fluid or disposed of in accordance with the regulations.	761.30(a)(2)(iii)	4.6.3
(15)	A PCB Transformer may be converted to PCB-Contaminated Electrical Equipment or to a non-PCB Transformer and a transformer that is classified as PCB-Contaminated Electrical Equipment may be reclassified to a non-PCB Transformer by draining, refilling and/or otherwise servicing the transformer.	761.30(a)(2)(v)	4.6.3
Use in Heat Transfer Systems and Hydraulic Systems (1)	Intentionally manufactured PCBs may be used in heat transfer systems and hydraulic systems in a manner other than a totally enclosed manner at a concentration level of less than 50 ppm provided that each system that ever contained PCBs at concentrations above 50 ppm was serviced to reduce the PCB concentration below 50 ppm and tested to show the PCB concentration is less than 50 ppm. Data obtained as a result must be retained for five years after the heat system reaches 50 ppm.	761.30(d) and (e)	4.2.2

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Subject	Regulatory Requirement	40 CFR Ref	Section
Use In and Servicing of Electromagnets, Switches and Voltage Regulators (1)	PCBs at any concentration may be used in electromagnets, switches, and voltage regulators for the remainder of their useful lives subject to specific conditions.	761.30(h)	4.2.3
Use in Capacitors (1)	PCBs at any concentration may be used in capacitors, subject to specific conditions.	761.30(l)	4.2.4
Use In and Servicing of Circuit Breakers, Reclosers and Cable (1)	PCBs at any concentration may be used in circuit breakers, reclosers, and cable and may be used for purposes of servicing this electrical equipment for the remainder of their useful lives, subject specific conditions.	761.30(m)	4.2.5
Marking of PCBS and PCB Items (1)	Specific items shall be marked with a PCB label.	761.40(a)	4.5.2
(2)	Each transport vehicle shall be marked on each end and side with the proper markings if it is loaded with PCB Containers that contain more than 45 kg of PCBs in the liquid phase or with one or more PCB Transformers.	761.40(b)	4.16.3
(3)	PCB Containers, PCB Transformers, Hydraulic systems using PCBs, and Heat transfer systems using PCBs, in concentrations of 50 to 500 ppm and applicable transport vehicles loaded with PCB Containers that contain more than 45 kg of liquid PCBs in concentrations of 50 ppm to 500 ppm shall be marked.	761.40(e)	4.5.2
(4)	Where mark M_L is specified but the PCB Article or PCB Equipment is too small to accommodate the smallest permissible size of M_L , mark M_S may be used instead of mark M_L .	761.40(f)	4.5.2
(5)	Large low voltage capacitor, small capacitors normally used in alternating current circuits, and fluorescent light ballasts manufactured between July 1, 1978 and July 1, 1998 that do not contain PCBs will be marked by the manufacturer at the time of manufacture with the statement, "No PCBs".	761.40(g)	4.5.2
(6)	Marks must be placed in a position or on the exterior of PCB Items or transport vehicles so that the marks can be easily read by any persons inspecting or servicing the marked items or vehicles.	761.40(h)	4.5.1
(7)	PCB Transformer locations shall be marked.	761.40(j)(1)	4.5.4

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Subject	Regulatory Requirement	40 CFR Ref	Section
Marking Formats (1)	PCB Marks shall be sufficiently durable to equal or exceed the life (including storage for disposal) of the PCB Article, PCB Equipment, or PCB Container. Specific requirements exist for the dimensions of the Large PCB Mark - M_L , Small PCB Mark - M_S .	761.45(a) and (b)	4.5.1
Storage and Disposal of PCBs, PCB Articles, PCB Containers, and PCB Spill Material (1)	Methods of disposal include incinerations chemical waste landfill, high efficiency boiler, or alternate approved method. Specific requirements are detailed in the regulations for the methods of disposal for PCBs, PCB Articles, PCB Containers, and PCB Spill Material.	761.60(a), (b), (c), and (d)	4.15
	PCB Small Capacitors and hydraulic machines that comply with the municipal solid waste disposal provisions are not required to be stored in a facility which complies with §761.65.	761.60(b)(6)	4.14
Storage for Disposal (1)	The storage for disposal requirements apply to PCBs at concentrations of 50 ppm or greater and PCB Items with PCB concentrations at 50 ppm or greater.	761.65	4.14
(2)	The facilities used for the storage of PCBs and PCB Items designated for disposal shall meet specific criteria.	761.65(b)	4.14.2
(3)	Specific PCB Items may be stored temporarily in an area that does not comply with the storage area requirements for up to thirty days from the date of their removal from service, provided that a notation is attached to the PCB Item or a PCB Container (containing the item) indicating the date the item was removed from service.	761.65(c)(1)	4.14.3
(4)	Any storage area subject to the requirements must be marked as required in the regulations.	761.65(c)(3)	4.5.3
(5)	Any item of movable equipment that is used for handling PCBs and PCB Items in the storage facilities and that comes in direct contact with PCBs shall be decontaminated prior to being removed from the storage facility.	761.65(c)(4)	4.14.1
(6)	All PCB Articles and PCB Containers in storage shall be checked for leaks at least once every 30 days. Any leaking PCB Articles and PCB Containers and their contents shall be transferred immediately to properly marked non-leaking containers. Any spilled or leaked materials shall be immediately clean up, using sorbents or other adequate means, and the PCB-contaminated materials and residues shall be disposed of in accordance with the regulations.	761.65(c)(5)	4.3.3
(7)	PCB Articles and PCB Containers shall be dated on the article or container when they are placed in storage.	761.65 (c)(8)	4.14.1

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Subject	Regulatory Requirement	40 CFR Ref	Section
(8)	Owners or operators of storage facilities shall establish and maintain records as provided in the regulations.	761.65(c)(9)	4.18.1
Approval of Decontamination (1)	Any PCB Container to be decontaminated shall be decontaminated by flushing the internal surfaces of the container three times with a solvent containing less than 50 ppm PCB.	761.79(a)	4.10.1
Scope of PCB Spill Cleanup (1)	The policy applies to spills resulting from the release of materials containing PCBs at concentration of 50 ppm or greater which occur after May 4, 1987. Existing spills (spills which occurred prior to May 4, 1987), are exempt from the scope of the TSCA policy.	761.120(a)	4.8.4
(2)	Where more than one requirement under other Federal statutory authority applies for the reporting of spills, the stricter standards must be met.	761.120(e)(3)	4.7.2.3
Disposal of Cleanup Debris and Materials (1)	All concentrated soils, solvents, rags and other materials resulting from the cleanup of PCBs shall be properly stored, labeled, and disposed of in accordance with the provisions of §761.60.	761.125(a)(2)	4.12
Requirements for cleanup of low-concentration (<500 ppm PCB) spills of <1 lb PCBs (1)	Specific requirements apply to the cleanup of low-concentration (<500 ppm PCB) spills which involve less than 1 pound of PCBs by weight (less than 270 gallons of untested mineral oil). Requirements for cleanup must be completed within 48 hours.	761.125(b)	4.8.2
(2)	Records and certification. At the completion of cleanup, the responsible party shall document the cleanup with records and certification of decontamination. The records and certification must be maintained for a period of 5 years.	761.125(b)(3)	4.9
Requirements for cleanup of all other spills (1)	Requirements for cleanup of high-concentration spills (>500 ppm PCBs) and low-concentration (<500 ppm PCB) spills of >1 lb PCBs. Immediate requirements: Notification and initiation of cleanup must be performed as quickly as possible and within no more than 24 hours (or within 48 hours for PCB Transformers).	761.125(c)	4.8.3
(2)	Spill Cleanup Records. The responsible party shall document the cleanup with records of decontamination.	761.125(c)(5)	4.9
Sampling Requirements (1)	Postcleanup sampling is required to verify the level of cleanup under the regulations.	761.130	4.18

Subject	Regulatory Requirement	40 CFR Ref	Section
Records and Monitoring (1)	Each owner of a facility using or storing at any one time at least 45 kilograms (99.4 pounds) of PCBs shall develop and maintain at the facility, or a central facility provided they are maintained at that facility, all annual records and the written annual document log of the disposition of PCBs and PCB Items.	761.180(a)	4.18.5
EPA Identification Numbers (1)	Any generator, commercial storer, transporter, or disposer of PCB waste is required to have an EPA identification number.	761.202(a)	4.15
The Manifest - General Requirements (1)	A generator who relinquishes control over PCB wastes by transporting, or offering for transport by his own vehicle or by a vehicle owned by another person, PCB waste for commercial off-site storage or off-site disposal shall prepare a manifest on EPA Form 8700-22.	761.207(a)	4.16.3
Retention of Manifest Records (1)	A generator of PCB waste shall keep a copy of each manifest signed in accordance with §761.208(a)(1) until the generator receives a signed copy from the designated commercial storage or disposal facility which received the PCB waste. A generator subject to annual document requirements under §761.180 shall retain copies of each manifest the period required by 761.180(a).	761.209(a)	4.18.4.1
Exception Reporting (1)	A generator of PCB waste shall take actions and file exception reports as specified in the regulations.	761.215(a) and (b), (d)	4.18.3
Certificate of Disposal (1)	For each shipment of manifested PCB waste that the owner or operator of a disposal facility accepts by signing the manifest, the owner or operator of the disposal facility shall prepare a Certificate of Disposal for the PCBs and PCB Items disposed of at the facility	761.218(a)	4.18.4.2
(2)	Generators of PCB waste shall keep a copy of each Certificate of Disposal that they receive from disposers of PCB waste among the records they retain under 761.180(a).	761.218(d)	4.18.4.2

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APPENDIX D

RESPONSIBILITIES MATRIX

ORGANIZATION	TSCA REQUIREMENT OR TSCA/RFP SUPPORT FUNCTION	MANAGEMENT PLAN SECTION
Environmental Restoration Management	<u>IDENTIFICATION/CLASSIFICATION/USES:</u>	
	(1) Identification of PCBs: Potential, and suspect PCB releases to the environment	4.1, 4.2, 4.11
	(2) PCB Source Classification: Determine IHSS status	4.11
	(3) Remediation Sites: IHSS inclusion in Inter-Agency Agreement	4.11
	<u>SAMPLING/ANALYSIS SUPPORT FUNCTIONS:</u>	
	(1) Initiate sampling and analysis for outside suspect areas and spills to the environment	N/A
	(2) Oversee subcontractor PCB sampling	N/A
	(3) Support Industrial Hygiene smear sampling	4.2.3
	<u>STORAGE AND DISPOSAL:</u>	
	(1) PCBs/PCB Items removed from service	Appendix C
	(2) PCBs stored in containers	4.5, 4.14
	(3) Marking PCBs/PCB Items in storage	4.5
	(4) PCBs/PCB Items; Storage time limits	4.15, Appendix C
	(5) PCB storage area requirements	4.14
	(6) PCB storage area inspections	4.3, 4.3.3
	(7) Recordkeeping	4.3.1, 4.3.2, 4.3.3
	<u>PCB SPILLS/RELEASES/CLEANUP:</u>	
	(1) Spill Response	4.7
	(2) Initial spill cleanup	4.7
	(3) Cleanup of Spills occurring after May 5, 1987	4.8.1
	(4) Cleanup of Spills occurring before May 5, 1987	4.8.2
	(5) Cleanup documentation	4.9

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ORGANIZATION	TSCA REQUIREMENT OR TSCA/RFP SUPPORT FUNCTION	MANAGEMENT PLAN SECTION
Facility Management and Operations	<u>IDENTIFICATION/CLASSIFICATION/USES:</u>	
	(1) Identification of PCBs: includes transformers, capacitors, electromagnets, switches, voltage regulators, hydraulic systems, PCB contaminated equipment, and PCB containers	4.1, 4.2
	(2) PCB Source Classification: Determine regulatory status	4.1, 4.2
	(3) PCB Transformer use and marking (inside buildings)	4.2, 4.5
	(4) PCB Transformer Inspections and Recordkeeping	4.3
	(5) PCB Transformer leaks	4.3.2
	(6) PCB contaminated equipment use	4.2
	(7) PCB electromagnets, switches, voltage regulators use	4.2
	(8) Circuit breakers, reclosers, cable use	4.2
	(9) Large Capacitors	4.2
	(10) Small Capacitors (includes fluorescent light ballasts)	N/A-not regulated
	(11) Heat transfer and hydraulic systems	4.2
	<u>STORAGE AND DISPOSAL:</u>	
	(1) PCBs/PCB Items removed from service	Appendix C
	(2) PCBs stored in containers	4.5, 4.14
	(3) Marking PCBs/PCB Items in storage	4.5
	(4) PCBs/PCB Items ; Storage time limits	4.15, Appendix C
	(5) PCB storage area requirements	4.14
	(6) PCB storage area inspections	4.3
	(7) Recordkeeping	4.3.1, 4.3.2, 4.3.3

Responsibilities Matrix (continued)

ORGANIZATION	TSCA REQUIREMENT OR TSCA/RFP SUPPORT FUNCTION	MANAGEMENT PLAN SECTION
Facility Management and Operations (cont.)	<u>PCB SPILLS/RELEASES/CLEANUP:</u>	
	(1) Spill Response	4.7
	(2) Initial spill cleanup	4.7
	(3) Cleanup of Spills occurring after May 5, 1987	4.8
	(4) Cleanup of Spills occurring before May 5, 1987	4.8
Analytical Laboratories	(5) Cleanup documentation	4.9
	<u>IDENTIFICATION/CLASSIFICATION/USES:</u>	
	(1) Identification of PCBs: PCB standards used for sample analysis	4.1, 4.2
	(2) PCB Source Classification: Regulatory status of standards based on original PCB concentration	4.1, 4.2
	(3) Uses: PCB Standards used in support of PCB on-site analysis program	Appendix C
	<u>STORAGE AND DISPOSAL:</u>	
	(1) PCBs/PCB contaminated sample waste	Appendix C
	(2) PCBs stored in containers	4.5, 4.14
	(3) Marking PCBs/PCB contaminated sample waste	4.5
	(4) Storage time Limits under TSCA	4.15, Appendix C
	(5) PCB storage area requirements	4.14
	(6) PCB storage area inspections	4.3
	(7) Recordkeeping	4.3.1, 4.3.2, 4.3.3
	<u>PCB SPILLS/RELEASES/CLEANUP:</u>	
	(1) Spill Response	4.7
	(2) Initial Spill cleanup	4.7
	(3) Cleanup of spills occurring after May 5, 1987	4.8
	(4) Cleanup of spills occurring before May 5, 1987	4.8
	(5) Cleanup Documentation	4.9

Responsibilities Matrix (continued)

ORGANIZATION	TSCA REQUIREMENT OR TSCA/RFP SUPPORT FUNCTION	MANAGEMENT PLAN SECTION
Industrial Hygiene	<u>TSCA/RFP SUPPORT FUNCTIONS:</u> (1) Determine Personnel Protective Equipment (PPE) for work situations involving TSCA materials (2) Coordinate or conduct air sampling for TSCA materials to determine airborne concentrations (3) Obtain surface samples of suspected PCB contamination for evaluation of potential impact on worker health (4) Oversee sampling through assessments and surveillance	N/A N/A N/A N/A
Engineering	<u>TSCA/RFP SUPPORT FUNCTIONS:</u> (1) Support activities associated with PCB electrical equipment projects (2) Review user needs for new electrical equipment to replace existing equipment containing PCBs and establish appropriate engineering criteria and technical requirements (3) Support Operations PCB cleanup efforts when such efforts may affect facility electrical configuration or on-site work in accordance with RFP Policies 9-9, 9-10, and 9-11.	4.2 4.2 4.2
Radiological Support (Engineering, Instrumentation, and Protection)	<u>TSCA/RFP SUPPORT FUNCTIONS:</u> (1) Maintain radiometric assay equipment (2) Perform Property Release Evaluations (3) Assist in design of engineering controls to minimize contamination for TSCA related projects (4) Determine RMMA, NON-RMMA status for PCBs, and PCB items plantwide (5) Monitor personnel, equipment, and TSCA work areas to ensure personnel and environmental safety	N/A N/A N/A 4.12.2 4.12.3

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Responsibilities Matrix (continued)

ORGANIZATION	TSCA REQUIREMENT OR TSCA/RFP SUPPORT FUNCTION	MANAGEMENT PLAN SECTION
Generators	<u>IDENTIFICATION/CLASSIFICATION/USES:</u>	
	(1) Identification of PCBs: includes transformers, capacitors, electromagnets, switches, voltage regulators, hydraulic systems, and PCB contaminated equipment	4.1, 4.2
	(2) PCB Source Classification: Determine regulatory status	4.1, 4.2
	(3) PCB Transformer use and marking (inside buildings, and outside)	4.2, 4.5
	(4) PCB Transformer Inspections and Recordkeeping	4.3
	(5) PCB Transformer leaks	4.3.2
	(6) PCB contaminated equipment use	4.2
	(7) PCB electromagnets, switches, voltage regulators use	4.2
	(8) Circuit breakers, reclosers, cable use	4.2
	(9) Large Capacitors	4.2
	(10) Small Capacitors (includes fluorescent light ballasts)	N/A-not regulated
	(11) Heat transfer and hydraulic systems	4.2
	<u>STORAGE AND DISPOSAL:</u>	
	(1) PCBs/PCB Items removed from service	Appendix C
	(2) PCBs stored in containers	4.5, 4.14
	(3) Marking PCBs/PCB Items in storage	4.5
	(4) PCBs/PCB Items; Storage time limits	4.15, Appendix C
	(5) PCB storage area requirements	4.14
	(6) PCB storage area inspections	4.3
	(7) Recordkeeping	4.3.1, 4.3.2, 4.3.3

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ORGANIZATION	TSCA REQUIREMENT OR TSCA/RFP SUPPORT FUNCTION	MANAGEMENT PLAN SECTION
Generators (cont.)	<u>PCB SPILLS/RELEASES/CLEANUP:</u>	
	(1) Spill Response	4.7
	(2) Initial spill cleanup	4.7
	(3) Cleanup of spills occurring after May 5, 1987	4.8
	(4) Cleanup of spills occurring before May 5, 1987	4.8
	(5) Cleanup Documentation	4.9
	<u>TRAINING:</u>	
	(1) TSCA classroom training	4.19
	(2) OJT Qualification (OJT qualification is currently under development)	4.19.2
Traffic	<u>TSCA/RFP SUPPORT FUNCTIONS:</u>	
	(1) Assure TSCA regulated wastes are properly classified, packaged, marked, labeled, and transferred in accordance with RFP On-Site Transportation Manual for on-site transfers	4.16
	(2) Prepare off-site shipping documentation and assure TSCA regulated waste manifests are prepared, returned, and retained in accordance with applicable regulations, DOE requirements, and EG&G Policies	4.16.2
	(3) Generate and maintain plant procedures specific to transportation compliance	4.16
	(4) Interface with Environmental and Waste Management and any other appropriate organizations on transportation compliance regarding TSCA	4.16.3
	(5) Ensure the appropriate personnel are trained to Hazardous Materials Worker and/or Employer in accordance with DOT regulations	4.16
	(6) Inspect loads and documentation for final certification as the Certification Official for off-site shipments	4.16.3
	(7) Coordinate the efforts of the On-Site Transportation Committee to ensure compliance to DOT, DOE, and EG&G requirements	4.16

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ORGANIZATION	TSCA REQUIREMENT OR TSCA/RFP SUPPORT FUNCTION	MANAGEMENT PLAN SECTION
Maintenance/Plant Support/Plant Services	<u>IDENTIFICATION/CLASSIFICATION/USES:</u>	
	(1) Identification of PCBs: includes transformers, capacitors, electromagnets, switches, voltage regulators, hydraulic systems, PCB contaminated equipment, and PCB containers.	4.1, 4.2
	(2) PCB Source Classification: Determine regulatory status	4.1, 4.2
	(3) PCB Transformer use and marking (outside buildings)	4.2, 4.5
	(4) PCB Transformer Inspections and Recordkeeping	4.3
	(5) PCB Transformer leaks	4.3.2
	(6) PCB contaminated equipment use	4.2
	(7) PCB electromagnets, switches, voltage regulators use	4.2
	(8) Circuit breakers, reclosers, cable use	4.2
	(9) Large Capacitors	4.2
	(10) Small Capacitors (includes fluorescent light ballasts)	N/A-not regulated
	(11) Heat transfer and hydraulic systems	4.2
	<u>STORAGE AND DISPOSAL:</u>	
	(1) PCBs/PCB Item removed from service	Appendix C
	(2) PCBs stored in containers	4.5, 4.14
	(3) Marking PCBs/PCB Items in storage	4.5
	(4) PCBs/PCB Items ; Storage time limits	4.15, Appendix C
	(5) PCB storage area requirements	4.14
	(6) PCB storage area inspections	4.3, 4.3.3
	(7) Recordkeeping	4.3.1, 4.3.2, 4.3.3

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E&WM, Waste Programs

Responsibilities Matrix (continued)

ORGANIZATION	TSCA REQUIREMENT OR TSCA/RFP SUPPORT FUNCTION	MANAGEMENT PLAN SECTION
Maintenance/Plant Support/Plant Services (cont.)	<u>PCB SPILLS/RELEASES/CLEANUP:</u> (1) Spill Response (2) Initial spill cleanup (3) Cleanup of Spills occurring after May 5, 1987 (4) Cleanup of Spills occurring before May 5, 1987 (5) Cleanup documentation	4.7 4.7 4.8 4.8 4.9
Waste Operations (Regulated Waste Operations, Waste Assay and Shipping, Waste Inspection)	<u>STORAGE AND DISPOSAL:</u> (1) PCBs/PCB Items removed from service (2) PCBs/PCB Items stored in containers (3) Marking PCBs/PCB Items in storage (4) PCBs/PCB Items: Storage time limits (5) PCB storage area requirements (6) PCB storage area inspections (7) Recordkeeping (8) WEMS input (9) Disposal Requirements (10) Waste profiling for disposal <u>PCB SPILLS/RELEASES/CLEANUP:</u> (1) Spill Response (2) Initial Spill Cleanup (3) Cleanup of spills occurring after May 5, 1987 (4) Cleanup of spills occurring before May 5, 1987 (5) Cleanup documentation	Appendix C 4.5, 4.14 4.5 4.15, Appendix C 4.14 4.3, 4.3.3 4.3.1, 4.3.2, 4.3.3 4.13 4.15 N/A 4.7 4.7 4.8 4.8 4.9

Responsibilities Matrix (continued)

ORGANIZATION	TSCA REQUIREMENT OR TSCA/RFP SUPPORT FUNCTION	MANAGEMENT PLAN SECTION
Waste Regulatory Programs	<u>TSCA PROGRAM MANAGEMENT:</u>	
	(1) TSCA program development, management, and administration.	3.0
	<u>IDENTIFICATION/CLASSIFICATION/USES:</u>	
	(1) Identification of PCBs/PCB Items.	4.2, Appendix C
	(2) PCB Source Classification.	4.1, 4.2
	(3) PCB Transformer use/markings.	4.2, 4.5
	(4) PCB transformer inspections/records/leaks	4.3, 4.3.2
	(5) PCB contaminated equipment use	Appendix C
	(6) PCB electromagnets, switches, voltage regulators.	4.2.1, Appendix C
	(7) Circuit breakers, reclosers, cable uses	4.2
	(8) Large capacitors	4.2
	(9) Small capacitors	N/A-not regulated
	(10) Heat transfer and hydraulic systems.	4.2
	<u>STORAGE AND DISPOSAL:</u>	
	(1) PCBs/PCB Items removed from service	Appendix C
	(2) PCBs stored in containers.	4.5, 4.14
	(3) Marking PCBs/PCB Items in storage	4.5
	(4) PCB storage time limits.	4.15, Appendix C
	(5) PCB storage area requirements.	4.14
	(6) PCB storage area inspections	4.3, 4.3.3
	(7) Recordkeeping	4.3.1, 4.3.2, 4.3.3
	(8) WEMS review	4.13.1
	(9) Disposal Requirements	4.15

Responsibilities Matrix (continued)

ORGANIZATION	TSCA REQUIREMENT OR TSCA/RFP SUPPORT FUNCTION	MANAGEMENT PLAN SECTION
Waste Regulatory Programs (cont.)	<u>PCB SPILLS/RELEASES/CLEANUP:</u> (1) Spill Response (2) Initial Spill cleanup (3) Cleanup of spill occurring after May 5, 1987 (4) Cleanup of spills occurring before May 5, 1987 (5) Cleanup documentation <u>PCB RECORDS:</u> (1) Inventories/Shipments/Disposal (2) Annual Document Log	4.7, Appendix C 4.7, Appendix C 4.8 4.8 4.9, Appendix C 3.0, 4.18 3.0, 4.18
Waste Program Plans	<u>TSCA/RFP SUPPORT FUNCTIONS:</u> (1) Prepare, issue, control, and maintain the TSCA Management Plan (2) Prepare, issue, control, and maintain project plans (3) Prepare and assist in the development of waste process control plans	N/A N/A N/A
Waste/Environmental Management System Program (WEMS)	<u>TSCA/RFP SUPPORT FUNCTIONS:</u> (1) Maintain the WEMS database that tracks waste from generation to disposal (2) Maintain the WEMS Software Quality Assurance Program (3) Provide TSCA Program Administrator weekly WEMS updates for PCB storage areas	4.13, 4.13.1 N/A 4.13
Waste Identification and Characterization	<u>TSCA/RFP SUPPORT FUNCTIONS:</u> (1) Maintain content and accuracy of PCBs, and PCB Items in the WSRIC building books (2) Administer the RFP waste stream sampling and analysis program (3) Interface with analytical laboratories	4.12, 4.12.3 N/A N/A